

## **EXHIBIT C**

### **To Millian Declaration**

**Gibson Dunn Billing Records Reflecting  
Time Expended by Gibson Dunn Timekeepers  
Associated with Sanctions Work**

## Time Entries for C/M #02176.00244

## Sanctions Work Hours

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
2/3/2010	15421	Adams, Jaclyn N.	8.4	4.5	2,002.50	Conduct review of documents marked as privileged by contract attorneys to ensure they are privileged or work product before production to SunTrust; comment on privileged documents to facilitate creation of the privilege log; review legal articles on spoliation from C. Brennan for background; communicate with B. Baldrate re: procedure used for review of privilege materials for the privilege log; confer with B. Baldrate and C. Brennan re: SunTrust's memorandum in response to United Guaranty's request for emergency relief; conduct legal research into attorney-client privilege and work product issues.
2/4/2010	15421	Adams, Jaclyn N.	10.7	8	3,560.00	Conduct legal research on piercing attorney-client privilege and work product protection in the Fourth Circuit and the Eastern District of Virginia Research; conference with B. Baldrate and C. Brennan re: legal research findings on same; conference with J. Millian, B. Baldrate and C. Brennan re: same; revise comments to privilege log for documents marked as attorney-client or work product protected.
2/5/2010	15421	Adams, Jaclyn N.	4.2	4.2	1,869.00	Conduct legal research on piercing attorney-client privilege and work product protection using implied waiver or the crime-fraud exception.
2/8/2010	15421	Adams, Jaclyn N.	6.1	6.1	2,714.50	Conduct legal research regarding piercing the attorney-client privilege and work product protection in cases of waiver or crime-fraud under both federal and state law; analyze whether privilege could be pierced as to documents related to the altered emails.
2/9/2010	15421	Adams, Jaclyn N.	10.2	10.2	4,539.00	Conduct legal research regarding piercing the attorney-client privilege and work product protection in cases of waiver or crime-fraud under both federal and state law; draft memorandum regarding the ability of United Guaranty to pierce the privilege for documents related to the altered emails; teleconference with C. Brennan and B. Baldrate re: same.
2/10/2010	15421	Adams, Jaclyn N.	14.9	14.9	6,630.50	Draft memorandum regarding the ability of United Guaranty to pierce the privilege for documents related to the altered emails; obtain relevant cases and note relevant sections for review by J. Millian; review comments on documents on the privilege log to ensure consistency and accuracy before production.
2/11/2010	15421	Adams, Jaclyn N.	8.6	8.6	3,827.00	Conference with B. Baldrate re: the court's order on privilege documents for in camera inspection and the deposition of Mary Pettitt; conduct legal research re: attorney-client privilege and work product doctrines as applied to former employees; confer with B. Baldrate and C. Brennan re: federal and state law on whether former employees are entitled to particular documents; conference with J. Millian and B. Baldrate re: same; conduct legal research on the common interest doctrine and sharing information with current and former employees.
2/12/2010	15421	Adams, Jaclyn N.	6.6	6.6	2,937.00	Conduct legal research regarding whether sharing privileged information with former employees waives the privilege under federal and state law.
2/15/2010	15421	Adams, Jaclyn N.	8.4	8.4	3,738.00	Confer with B. Baldrate, C. Brennan, and J. Caughey re: legal research findings on attorney-client privilege with regard to former employees; review transcript of deposition of Mary Pettitt; review privilege logs from SunTrust re: documents related to the February 22, 2009 email; analyze SunTrust's memorandum re: privilege issues; review background materials on spoliation; draft first draft of United Guaranty's response to SunTrust's memorandum re: privilege issues.
2/16/2010	15421	Adams, Jaclyn N.	8.4	8.4	3,738.00	Conduct legal research on the Virginia state law of privilege; prepare first draft of United Guaranty's response to SunTrust's memorandum re: privilege issues; confer with C. Brennan and B. Baldrate re: same; review deposition transcripts, hearing transcripts, and previous court filings in order to determine which factual development to highlight in the privilege reply.
2/17/2010	15421	Adams, Jaclyn N.	11.1	11.1	4,939.50	Prepare first draft of United Guaranty's response to SunTrust's memorandum re: privilege issues; confirm citations to law in the draft response.
2/18/2010	15421	Adams, Jaclyn N.	10.9	10.9	4,850.50	Review outline of United Guaranty's response re: privilege issues from J. Millian; conduct legal research re: the ability to overcome work product protection; confer with B. Baldrate re: legal research on opinion and non-opinion work product; conduct legal research re: same; draft portion of response re: privilege issues dealing with SunTrust's actions firing Pettitt.
2/19/2010	15421	Adams, Jaclyn N.	5.5	5.5	2,447.50	Communicate with J. Millian re: meeting to discuss spoliation research; confer with C. Brennan and B. Baldrate re: same; conference with J. Millian re: legal research into spoliation issues; conduct legal research re: same.
2/20/2010	15421	Adams, Jaclyn N.	6.8	6.8	3,026.00	Conduct legal research re: the standards for obtaining sanctions for spoliation, and the various sources of authority for such sanctions.
2/22/2010	15421	Adams, Jaclyn N.	3.6	3.6	1,602.00	Confer with C. Brennan re: United Guaranty's response to SunTrust's memorandum re: privilege issues; review latest draft of same to ensure the legal argument is sound; revise same.
2/24/2010	15421	Adams, Jaclyn N.	3.2	3.2	1,424.00	Conduct legal research re: spoliation sanctions and the possibility of various degrees of sanction.
2/25/2010	15421	Adams, Jaclyn N.	14.3	14.3	6,363.50	Confer with J. Caughey re: the collection of the facts surrounding SunTrust's actions with regard to the altered emails; draft memorandum re: spoliation sanctions; confer with B. Baldrate re: same; confer with J. Caughey re: drafting factual background for memorandum.
2/26/2010	15421	Adams, Jaclyn N.	17	17	7,565.00	Draft memorandum re: spoliation sanctions; confer with B. Baldrate re: same; confer with J. Caughey re: factual background for memorandum.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
3/2/2010	15421	Adams, Jaclyn N.	2.4	2.4	1,068.00	Review SunTrust's reply re: privilege issues related the February 22, 2008 email; analyze cases cited in SunTrust's reply; teleconference with B. Baldrate re: analysis of SunTrust's exhibit listing privileged documents related to the February 22, 2008 email; formulate arguments for reply to motion to compel based on SunTrust's arguments in reply re: the February 22, 2008 email.
3/3/2010	15421	Adams, Jaclyn N.	2.8	2.8	1,246.00	Analyze SunTrust's reply re: privilege issues; draft notes re: reply; confer with B. Baldrate and C. Brennan re: spoliation research and memorandum; confer with J. Millian re same.
3/4/2010	15421	Adams, Jaclyn N.	4	4	1,780.00	Revise memorandum re: potential spoliation sanctions; conference with J. Millian, B. Baldrate, C. Brennan, and J. Caughey re: motion to dismiss and spoliation memorandum; teleconference with J. Caughey re: background facts for the spoliation memorandum.
3/5/2010	15421	Adams, Jaclyn N.	0.8	0.8	356.00	Confer with B. Baldrate and C. Brennan re: spoliation memorandum and upcoming spoliation motion; review draft motion to dismiss to compare characterization of SunTrust's claims
3/6/2010	15421	Adams, Jaclyn N.	0.4	0.4	178.00	Revise spoliation memorandum to include a broader view of the law re: sanctions for spoliation.
3/7/2010	15421	Adams, Jaclyn N.	11.9	11.9	5,295.50	Review spoliation memorandum to include more cases demonstrating how courts apply sanctions for spoliation and fraud on the court under their inherent authority, Rule 37, Rule 11, and the clean hands doctrine.
3/8/2010	15421	Adams, Jaclyn N.	8.4	4	1,780.00	Revise memorandum regarding options for seeking sanctions for spoliation to include extended case law discussion; review draft motion to dismiss; confer with B. Baldrate re: revisions to memorandum on spoliation and draft motion to dismiss.
3/9/2010	15421	Adams, Jaclyn N.	7.7	7.7	3,426.50	Draft outline of spoliation motion; conference with B. Baldrate re: strategy for spoliation motion; conduct legal research re: the duty to investigate factual assertions in pleadings under Rule 11.
3/10/2010	15421	Adams, Jaclyn N.	6.4	6.4	2,848.00	Confer with B. Baldrate re: spoliation case involving SunTrust out of the Northern District of Georgia and the scope of employment under Virginia law; revise and expand draft outline of motion for sanctions against SunTrust; confer with C. Brennan re: same; conduct legal research on the ability to obtain an adverse jury inference from against an employer whose former employee pleads the Fifth Amendment.
3/11/2010	15421	Adams, Jaclyn N.	5.2	5.2	2,314.00	Teleconference with B. Baldrate re: legal research on allowable inferences against witnesses who invoke their Fifth Amendment right not to testify; confer with B. Baldrate re: draft outline of motion for sanctions and draft memorandum on the possibility of seeking sanctions; revise draft outline of sanctions motion to include Fifth Amendment research; distribute new draft outline to J. Millian.
3/12/2010	15421	Adams, Jaclyn N.	6.3	6.3	2,803.50	Confer with B. Baldrate re: dismissal on account of a necessary witness invoking the Fifth Amendment; conduct legal research on same; distribute legal research on same to B. Baldrate; revise outline of motion for sanctions to include new legal research.
3/14/2010	15421	Adams, Jaclyn N.	2.3	2.3	1,023.50	Revise memorandum on seeking sanctions against SunTrust for spoliation to include case law on the ability to obtain dismissal based on the Fifth Amendment, references to case law on dismissal generally, and the inapplicability of Rule 26.
3/15/2010	15421	Adams, Jaclyn N.	6.1	6.1	2,714.50	Confer with B. Baldrate re: section of the reply brief on privilege issues dealing with the documents SunTrust submitted to the court for in camera review; draft same section of reply brief and review SunTrust's privilege log and descriptions of documents in relation to same.
3/16/2010	15421	Adams, Jaclyn N.	1	1	445.00	Complete drafting of section of reply brief on privilege issues addressing the documents SunTrust submitted to the court for in camera review; distribute same to B. Baldrate.
6/15/2010	15421	Adams, Jaclyn N.	0.4	0.4	178.00	Confer with B. Baldrate about motion for sanctions against SunTrust; confer with J. Caughey re: same and new factual developments in the case.
6/16/2010	15421	Adams, Jaclyn N.	3.6	3.6	1,602.00	Confer with J. Caughey re: case law on sanctions less than dismissal; conduct legal research into monetary sanctions and sanctions less than dismissal.
6/17/2010	15421	Adams, Jaclyn N.	2	2	890.00	Conduct legal research into sanctions less than dismissal; confer with J. Caughey re: findings.
6/24/2010	15421	Adams, Jaclyn N.	0.8	0.8	356.00	Conduct legal research re: alternative sanctions to dismissal.
6/25/2010	15421	Adams, Jaclyn N.	5.1	5.1	2,269.50	Conduct legal research on sanction of evidence preclusion and The Fifth Amendment; communicate with B. Baldrate re: same; revise sanctions brief to include new research.
7/1/2010	15421	Adams, Jaclyn N.	2.6	2.6	1,157.00	Conduct legal research re: Virginia attorney ethics requirements; confer with B. Baldrate re: same; draft communication to T. Dupree re: findings and discussing legal ethics opinions.
7/2/2010	15421	Adams, Jaclyn N.	0.8	0.8	356.00	Draft communication to T. Dupree and B. Baldrate re: Virginia ethical rules; conduct legal research re: duty to disclose client information; draft communication to T. Dupree and B. Baldrate re: same.
7/6/2010	15421	Adams, Jaclyn N.	5.1	5.1	2,269.50	Conduct legal research re: ethical rules for attorneys in Virginia and Georgia, and how sanctions affect the merits of a case.
7/7/2010	15421	Adams, Jaclyn N.	4.3	4.3	1,913.50	Draft communication to R. Mastro, T. Dupree, and B. Baldrate re: the ethical rules for attorneys in Georgia; conduct legal research re: merits determinations and sanctions for litigation misconduct.
7/9/2010	15421	Adams, Jaclyn N.	3.4	3.4	1,513.00	Draft communication to J. Millian, R. Mastro, T. Dupree and B. Baldrate re: ethics rules in Virginia and Georgia; conduct legal research re: how sanctions can affect the merits of a case.
7/12/2010	15421	Adams, Jaclyn N.	9	9	4,005.00	Conduct legal research re: summary judgment or other dispositive actions following exclusion of evidence as a sanction.

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7/13/2010	15421	Adams, Jaclyn N.	4.8	4.8	2,136.00	Revise draft motion to include new legal research; draft email communication to T. Dupree re: summary judgment following exclusion of evidence as a sanction; confer B. Baldrate re: same.
7/14/2010	15421	Adams, Jaclyn N.	0.9	0.9	400.50	Communicate with T. Dupree re: dispositive motions following exclusion of evidence; conduct legal research re: same.
7/16/2010	15421	Adams, Jaclyn N.	0.2	0.2	89.00	Teleconference with B. Baldrate re: memorandum on summary judgment following sanctions.
7/20/2010	15421	Adams, Jaclyn N.	0.7	0.7	311.50	Draft memorandum re: legal research findings on summary judgment following sanctions.
7/21/2010	15421	Adams, Jaclyn N.	11.9	11.9	5,295.50	Draft memorandum re: legal research findings on summary judgment following sanctions.
9/22/2010	15421	Adams, Jaclyn N.	1.1	1.1	489.50	Communicate with J. Caughey re: standard for sanctions in the Fourth Circuit; conduct legal research re: same; draft communication to T. Dupree, B. Baldrate, and J. Caughey re: same.
9/25/2010	15421	Adams, Jaclyn N.	1.6	1	445.00	Communicate with B. Baldrate re: research on summary judgment and sanctions; draft communication to R. Mastro; J. Millian; T. Dupree; W. Wegner; and K. Brennan re: memorandum and summary of findings on same issue; communicate with W. Wegner re: cases in the Eastern District of Virginia; communicate with R. Mastro re: the state of the case law.
9/28/2010	15421	Adams, Jaclyn N.	4.7	4.7	2,091.50	Conduct legal research re: confrontation rights against key witnesses and due process issues relating to unavailable witnesses.
9/29/2010	15421	Adams, Jaclyn N.	4.1	4.1	1,824.50	Conduct legal research re: due process problems arising from unavailable witnesses; confer with J. Caughey re: same; confer with B. Baldrate re: same; draft argument for summary judgment motion re: due process problems associated with witnesses' invocation of Fifth Amendment.
9/30/2010	15421	Adams, Jaclyn N.	10.7		-	Conduct legal research re: due process issues with unavailable witnesses and invocation of the Fifth Amendment; confer with J. Caughey re: same; draft portion of summary judgment motion addressing the Fifth Amendment issues; conduct legal research re: insurance law in Virginia; analyze case law to determine most effective summary judgment strategy; confer with J. Caughey re: same; communicate with J. Caughey re: most pertinent Virginia law.
10/1/2010	15421	Adams, Jaclyn N.	3.5	3	1,335.00	Communicate with J. Caughey re: Virginia law on exclusions in insurance contracts; communicate with J. Caughey re: Virginia ethics rules for attorneys; communicate with J. Caughey and B. Baldrate re: case law on shifting the burden on account of a witness pleading the Fifth Amendment; review communications with Peter Broadbent (DurrettBradshaw) re: Virginia ethics rules for attorneys; teleconference with J. Caughey re: Virginia law on insurance exclusions; teleconference with B. Baldrate re: due process research; draft communication to B. Baldrate summarizing due process research findings.
10/2/2010	15421	Adams, Jaclyn N.	4.1	4.1	1,824.50	Conduct research on legal ethics publications by Thomas Spahn; communicate with J. Caughey re: findings of same; communicate with J. Caughey re: Virginia Legal Ethics Opinions that may be applicable to this case.
10/3/2010	15421	Adams, Jaclyn N.	1.4	1.4	623.00	Conduct legal research into Virginia Legal Ethics Opinions and summaries; communicate with J. Caughey re: most applicable opinions and summary of findings; review communications from J. Zelenay, W. Wegner and B. Baldrate re: due process research; review communications from R. Mastro re: Virginia legal ethics opinions.
10/4/2010	15421	Adams, Jaclyn N.	1.4	1.4	623.00	Review email from Peter Broadbent (DurrettBradshaw); communicate with J. Caughey re: Virginia legal ethics research; conduct legal research on ethics opinions of Thomas Spahn.
10/27/2010	15421	Adams, Jaclyn N.	0.7	0.7	311.50	Review ethics research and distribute to B. Baldrate, C. Brennan, and J. Caughey.
11/10/2010	15421	Adams, Jaclyn N.	2.7	2.7	1,201.50	Conduct legal research re: definition of fraud on the court; draft communications to B. Baldrate re: legal findings.
12/2/2010	15421	Adams, Jaclyn N.	0.9	0.9	400.50	Confer with J. Caughey re: draft reply re: appropriate remedies for fraud on the court and potential ethics violations.
12/3/2010	15421	Adams, Jaclyn N.	4	4	1,780.00	Review Virginia ethics rules and opinions; confer with J. Caughey re: same; participate in meeting with B. Baldrate, K. Brennan, and J. Caughey re: arguments in reply re: appropriate remedy for SunTrust's actions.
12/11/2009	15524	Baldrate, Brian C.	6.5	2	1,180.00	Receive and review email from SunTrust; confer with J. Millian, C. Brennan and J. Caughey and discuss response, review and revise motion to dismiss.
12/14/2009	15524	Baldrate, Brian C.	17	0.5	295.00	Review, revise and edit motion to dismiss and counter-claim; confer with C. Brennan, J. Millian and J. Caughey re same; review and discuss issues of potential spoliation of evidence.
12/17/2009	15524	Baldrate, Brian C.	3.8	3.8	2,212.50	Confer with J. Millian, C. Brennan and W. Durrette re: strategy in dealing with willful spoliation of evidence; confer with J. Millian, C. Brennan, B. Hall and S. Meideros re: case strategy; review and research responses to spoliation issues.
12/18/2009	15524	Baldrate, Brian C.	9.3	9	5,281.45	Review supplemental responses to interrogatories; confer with C. Brennan re: same; draft motion re: spoliation issues and expedited discovery order.
12/20/2009	15524	Baldrate, Brian C.	4.3	2	1,166.28	Review and revise motion for expedited discovery; review SunTrust's motion to compel and confer with J. Caughey re: responses.
12/21/2009	15524	Baldrate, Brian C.	10.5	5	2,950.00	Review and revise motion for a temporary restraining order; confer with J. Caughey and C. Brennan re response to motion to compel; review and revise initial disclosures letter and letter supplementing interrogatories; prepare, review, and revise motion and order; confer with S. Millard re information on risk committee.
12/22/2009	15524	Baldrate, Brian C.	8.8	4	2,346.59	Review and revise motion for a temporary restraining order; confer with J. Caughey and C. Brennan re response to motion to compel; review documents in responding to initial production.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
12/24/2009	15524	Baldrate, Brian C.	3.3	3.3	1,917.50	Edit draft motion; work with KPMG on additional forensic testing; confer with T. Choe and T. Keegan re discovery and forensic testing of recently received data; correspond with J. Millian and C. Brennan re same.
12/27/2009	15524	Baldrate, Brian C.	1.3	1.3	737.50	Review data related to forensic testing; review production of documents from SunTrust; correspond with C. Brennan and J. Caughey re production of documents.
12/28/2009	15524	Baldrate, Brian C.	0.8	0.8	442.50	Confer with C. Brennan re spoliation motion; review motion and affidavit from KPMG.
12/29/2009	15524	Baldrate, Brian C.	1.8	0.5	286.81	Confer with J. Caughey re discovery issues and completion of production; confer with C. Brennan and J. Caughey, receive update on today's hearing, and discuss discovery strategy; receive and review electronic discovery search terms.
1/6/2010	15524	Baldrate, Brian C.	5.8	5.8	3,335.00	Review and revise documents re production surrounding the February 22, 2009 email; review search terms and assist in production and preparation of documents; confer with J. Millian and C. Brennan re strategy in responding to production concerning February 22, 2009 email and upcoming hearing; confer with J. Caughey and C. Brennan (partial).
1/13/2010	15524	Baldrate, Brian C.	11	1	575.00	Review documents including first electronic production, claims files, and potentially hot files; confer with KPMG, A. Lesch, and V. Bratcher re document production issues; assist J. Caughey re training and adding additional contract attorneys to perform document review; review and respond to electronic discovery questions from contract attorneys, KPMG, and privilege review team; confer with J. Caughey re drafting responses to SunTrust's discovery; receive and review correspondence from T. Sabalewski re imaging of M. Pettit's hard drive; confer with J. Millian and C. Brennan re strategy in responding to same; confer with J. Caughey and KPMG re additional document review and additional review attorneys; confer with C. Brennan and A. Lesch re first production of electronic documents; draft correspondence to C. Manchester re same; confer with J. Millian and C. Brennan re privilege review issues; confer with N. Raspa, K. Amborn, N. Adams, M. Healy, and R. Bull re same; multiple calls with KPMG, V. Bratcher, A. Lesch, and C. Brennan re document production; multiple electronic correspondences with N. Raspa, K. Amborn, N. Adams, M. Healy, and R. Bull re status of privilege review and answering questions regarding privilege review.
1/20/2010	15524	Baldrate, Brian C.	9	1	575.00	Receive correspondence from T. Sabalewski canceling conference with court; draft motion for extension of time to complete discovery; confer with J. Millian, W. Durette, and C. Brennan re: same; multiple conferences with V. Bratcher, C. Brennan, and A. Lesch re: electronic discovery and upload issues with KPMG; review and revise on whether documents are responsive in answer to questions from contract attorneys; confer with J. Caughey and refine plan for completing discovery; review attorney-client privilege material, redaction of spreadsheets; review and QA fourth production to SunTrust; draft and send correspondence and hard drive re: same; confer with J. Millian, W. Durette, and C. Brennan re: strategy in accelerating SunTrust's obligation to produce documents related to spoliation issues; draft correspondence to SunTrust re: same; work with C. Brennan and V. Bratcher to resolve issues with KPMG's search filter.
1/21/2010	15524	Baldrate, Brian C.	8.5	1	575.00	Receive and review productivity report and revise electronic discovery production plan accordingly; receive and review SunTrust's supplemental production of documents; receive SunTrust's motion for extension of time and discuss strategy options; receive and review QA documents from recent productions; identify and resolve issues with privilege filter; confer with C. Brennan, and J. Caughey and resolve contract attorney resourcing issues; review spreadsheets, revise KPMG tag files, and provide guidance to contractor attorneys on handling of these documents; review and reorganize privilege review documents.
1/22/2010	15524	Baldrate, Brian C.	9.8	5	2,875.00	Research, review, and revise draft opposition to Suntrust motion; confer with J. Millian and C. Brennan re: same; receive and review requests from contract attorneys on attorney client privilege issues and document review issues; receive and review hot documents from prior reviews; receive recent data and draft and send correspondence to SunTrust re: fifth production of documents; receive and review daily productivity report and adjust workplan accordingly; confer with J. Caughey and discuss review of spreadsheets and advise on redaction issues; multiple correspondence and calls with V. Bratcher re: various issues with electronic production.
1/25/2010	15524	Baldrate, Brian C.	8.3	1.5	862.50	Receive and review productivity report; review and revise batching decisions accordingly; confer with J. Caughey re: issues with potentially responsive documents; review documents tagged as produce in preparation for today's production; review QA of produced documents and identify problems and decide whether to withhold or produce; confer with T. Keegan and V. Bratcher re: issue regarding additional documents for review; confer with C. Brennan re: redistribution of batching materials to improve review plan; receive and review draft order from T. Sabalewski; confer with J. Millian and C. Brennan in preparation for status call with Court; participate in status call with SunTrust; draft and send sixth production to SunTrust after reviewing data and potential hot documents; confer with C. Brennan and J. Caughey re: potential responsive documents and make decisions related to those documents.
1/27/2010	15524	Baldrate, Brian C.	5.8	3	1,725.00	Receive and review productivity report and adjust document production plan accordingly; prepare for and participate in status call with Court; confer with J. Millian and C. Brennan and discuss strategy re: M. Pettitt's deposition; review additional documents for seventh production to KPMG; confer with C. Brennan and review hot documents from contract attorney review; receive, review and analyze SunTrust's response to interrogatory related to M. Pettitt's alteration of documents.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
1/28/2010	15524	Baldrate, Brian C.	6.5	2	1,150.00	Receive and review additional documents for production that need to be QA and reviewed; confer with J. Caughey and review process for creating electronic privilege log; collect and gather case law and sample briefs on spoliation issues in preparation for sanctions motion; confer with GDC attorneys and respond to questions on privilege issues; confer with A. Lesch, V. Bratcher, and C. Brennan re: production timeline and schedule; confer with J. Millian and C. Brennan on spoliation issues and strategy in conducting depositions; confer J. Caughey re: drafting subpoena duces tecum and provide guidance and samples; confer with V. Bratcher and C. Brennan re: privilege log issues.
1/29/2010	15524	Baldrate, Brian C.	10	3	1,725.00	Review final production, draft correspondence and send to SunTrust; review and revise discovery responses, confer with C. Brennan re: same; forward completed discovery responses to SunTrust; confer with V. Bratcher and C. Brennan re: privilege log and production issues; confer with J. Caughey and GDC privilege review team and review potentially privileged documents; confer with W. Durette and C. Brennan and discuss deposition logistics and dates; confer with J. Millian and C. Brennan and discuss spoliation issues and deposition strategy; confer with C. Brennan on spoliation issues and create spoliation binder; confer with J. Caughey and review and revise notice of deposition and subpoena duces tecum.
2/1/2010	15524	Baldrate, Brian C.	8	4	2,300.00	Confer with J. Caughey and GDC review team on questions of attorney client privilege; review documents and mark accordingly; review, revise, and develop coding plan for contract attorney review of SunTrust documents; multiple conference calls with C. Brennan and V. Bratcher re: coding SunTrust documents; continue review and organization of hot documents from United Guaranty productions; finalize subpoena duces tecum for M. Pettitt; correspond with W. Durette re: same; serve subpoena on M. Pettitt and correspond with T. Sabalewski re: privilege issues for Pettitt deposition; confer with J. Millian and C. Brennan and discuss case strategy.
2/2/2010	15524	Baldrate, Brian C.	7.5	5	2,875.00	Confer with J. Millian, C. Brennan, and W. Durette re: deposition strategy; correspond with SunTrust re: subpoena issues and potential motion to quash; confer with J. Caughey and C. Brennan in preparation of new contract attorney review; review and respond to privilege review issues log; conduct additional review of hot documents and potential attorney-client documents; multiple conferences with V. Bratcher re: privilege log, review of SunTrust data, and additional document production issues; confer with C. Brennan and N. Adams and discuss strategy for spoliation motion; receive and respond to correspondence from SunTrust re: M. Pettitt's deposition.
2/3/2010	15524	Baldrate, Brian C.	7.5	5	2,875.00	Receive and review privilege log from KPMG; review and modify accordingly; confer with W. Durette and J. Millian re: response to SunTrust's assertion of privilege for upcoming deposition of M. Pettitt; complete review of hot docs; confer with N. Adams re: spoliation memorandum; multiple calls and conference with GDC attorneys, C. Brennan and V. Bratcher, re: privilege issues; receive and review SunTrust's opposition motion to United Guaranty's motion for emergency relief; confer with W. Durette, C. Brennan, and J. Millian and discuss case strategy; confer with J. Caughey and provide guidance and review production spreadsheet; begin gathering documents to file additional emergency relief and prepare for M. Pettitt deposition and follow-on depositions with SunTrust personnel including in-house counsel.
2/4/2010	15524	Baldrate, Brian C.	11.3	11.3	6,497.50	Receive and review SunTrust documents in preparation of M. Pettitt deposition; receive, review, edit, and modify privilege log and answer questions re: same; receive and review contract attorneys production reports and adjust review plan accordingly; confer with J. Caughey and advise on plan for tracking SunTrust data; confer with V. Bratcher (partial) and A. Lesch on issues with SunTrust's document production; receive and review SunTrust's second privilege log; confer with KPMG re: review of M. Pettitt's electronic data; confer with W. Durette on deposition dates; confer with J. Millian (partial), N. Adams, and C. Brennan re: waiver issues and crime fraud exception; confer with J. Millian re: SunTrust document production issues.
2/8/2010	15524	Baldrate, Brian C.	1.8	1.8	1,035.00	Spoliation: Confer with C. Brennan and J. Caughey re: preparation material for M. Pettitt; receive and review additional documents from A. Lesch re: M. Pettitt.
2/9/2010	15524	Baldrate, Brian C.	7.5	7.5	4,312.50	Spoliation: Review and revise deposition outline and review documents for M. Pettitt; confer with SunTrust re: M. Pettitt's deposition; receive and review M. Pettitt's motion for a protective order; confer with J. Millian and C. Brennan re: case strategy and responding to SunTrust's identification of additional altered emails and identifying additional altered emails; draft response to Pettitt's motion to quash.
2/10/2010	15524	Baldrate, Brian C.	3.5	3.5	2,012.50	Spoliation: Confer with J. Millian and C. Brennan re: Response to Pettitt motion; prepare for M. Pettitt deposition; confer with C. Brennan and J. Caughey re: M. Pettitt deposition preparation; confer with N. Adams re: privilege waiver and crime/fraud exception research; correspond with J. Millian re: same; review edits and file response motion; review and analyze metadata from KPMG related to the Feb 22, 2009 email.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
2/11/2010	15524	Baldrate, Brian C.	6	6	3,450.00	Spoliation: Prepare for deposition of M. Pettitt by organizing and reviewing documents and creating deposition binder, receive and review documents related to additional altered emails; research and analyze those documents; confer with N. Adams and conduct research on waiver issues if SunTrust shares privileged documents with M. Pettitt; confer with W. Durette re: research on SunTrust waiver; confer with C. Brennan and J. Caughey re: various issue related to M. Pettitt deposition; receive and review SunTrust's motion for a protective order; correspond with J. Millian and C. Brennan re: same.
2/12/2010	15524	Baldrate, Brian C.	2.8	2.8	1,610.00	Spoliation: Review, edit, and revise attorney client and crime fraud waiver issues; correspond with N. Adams and J. Millian re: same; receive and review SunTrust's supplemental spoliation privilege log.
2/15/2010	15524	Baldrate, Brian C.	4.5	4.5	2,587.50	Spoliation - Confer with C. Brennan and J. Caughey re: research on Clack and Thurman depositions; confer with N. Adams and review and analyze cases on common interest privilege to assist in drafting memorandum re: same; confer with J. Millian re: document preparation and production issues for J. Clack's deposition; research SunTrust's production for documents related to Clack and Thurman's deposition; begin research on further spoliation issues.
2/16/2010	15524	Baldrate, Brian C.	3.3	3.3	1,897.50	Spoliation - Receive and review court order re: order to seal; correspond with J. Millian and C. Brennan re: same; confer with J. Millian re: J. Clack deposition and identifying an additional altered documents; confer with C. Brennan re: response to SunTrust's motion to quash subpoenas and to assert privilege over spoliation documents; receive and review SunTrust's motion for a protective order seeking to keep documents related to the maintaining the privilege on other altered documents; confer with C. Brennan re: same; review various SunTrust document productions to attempt to identify the other emails altered by M. Pettitt; confer with N. Adams and C. Brennan and begin drafting response to SunTrust's motion for a protective order.
2/17/2010	15524	Baldrate, Brian C.	2.5	2.5	1,437.50	Spoliation - Receive and review additional documents from M. Pettitt's deposition and subpoena duces tecum; receive and review additional spoliation documents from Reed Smith; confer with J. Caughey and C. Brennan and begin drafting spoliation timeline; continue work on response to protective order.
2/18/2010	15524	Baldrate, Brian C.	9.5	9.5	5,462.50	Spoliation - Review correspondence from J. Millian and draft response to SunTrust's privilege brief; review and analyze and confer with C. Brennan re: same; assist in scheduling deposition of M. Pettitt; receive and review depositions of J. Clack and S. Thurman; confer with J. Millian and C. Brennan and discuss strategy in responding to SunTrust's protective order; confer with N. Adams and discuss and review waiver issues and crime fraud exception; confer with J. Brennan and discuss and review spoliation timeline.
2/20/2010	15524	Baldrate, Brian C.	2	2	1,150.00	Spoliation - Review and revise memorandum in response to SunTrust's privilege brief; edit and revise factual narrative related to spoliation.
2/22/2010	15524	Baldrate, Brian C.	10.3	10.3	5,922.50	Spoliation: Draft and revise motion to compel and proposed order; confer with J. Caughey and review documents and exhibits to motion; review and edit factual section and procedural posture; review and refine waiver and crime fraud; prepare and organize exhibits; review and revise order and motion.
2/23/2010	15524	Baldrate, Brian C.	1.8	1.8	1,035.00	Spoliation: Receive and review spoliation and adverse inference research from W. Durette; confer with N. Adams and C. Brennan re: drafting spoliation motion going forward and research further spoliation case law.
2/24/2010	15524	Baldrate, Brian C.	6	6	3,450.00	Spoliation: Research Fifth Amendment issue related to M. Pettitt's deposition exhibit; correspond with T. Sabalewski re: briefing timeline for motion to compel; confer with N. Adams and J. Caughey (partial) re: spoliation memorandum and progress; confer with C. Seltzer re: Fifth Amendment issues related to M. Pettitt's deposition exhibit; conduct research re: same and prepare for conference with Court.
2/25/2010	15524	Baldrate, Brian C.	3	3	1,725.00	Spoliation: Prepare for conference call with Court re: spoliation issues and assertion of privilege; confer with J. Millian and discuss strategy; continue Fifth Amendment research and confer with C. Seltzer re: M. Pettitt's deposition exhibit; review and analyze fake documents and confer with J. Caughey re: metadata; confer with J. Caughey and assist in drafting factual background on Spoliation motion; participate in conference with the Court re: privilege log related to spoliation documents; conference with J. Millian, W. Durette, and S. Meideros re: case strategy and developments.
2/26/2010	15524	Baldrate, Brian C.	2	2	1,150.00	Spoliation: Confer with N. Adams re: spoliation motion; review and analyze production of documents from M. Pettitt's deposition and confer with J. Caughey re: same; receive and review SunTrust's most recent production and prepare spoliation responses and objections related to SunTrust's failure to produce documents of S. Thurman and other key parties.
3/1/2010	15524	Baldrate, Brian C.	2	2	1,150.00	Spoliation: Review and revise spoliation memorandum from N. Adams and discuss different options; confer with C. Brennan and J. Millian re: approaches to filing spoliation motion; receive and review SunTrust's privilege brief; confer with C. Brennan and J. Millian re: United Guaranty's motion to compel and other issues related to further expedited discovery regarding the additional fake emails.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
3/2/2010	15524	Baldrate, Brian C.	2	2	1,150.00	Spoliation: Continue review of SunTrust's reply to the Court's privilege order; confer with W. Durrette, J. Millian, and C. Brennan re: same; continue to review and edit spoliation memorandum; research fifth amendment waiver issue; confer with J. Millian and C. Brennan and correspond with C. Seltzer re: withdrawing M. Pettitt's objection to deposition exhibit; coordinate and schedule deposition of P. Gavin and arrange for hearing on United Guaranty's motion to compel.
3/3/2010	15524	Baldrate, Brian C.	3.5	3.5	2,012.50	Spoliation: Confer with M. Dumfries, J. Millian, C. Brennan, and W. Durrette re: motion to compel and deposition of P. Gavin; confer with N. Adams and C. Brennan re: reply to SunTrust's privilege brief; receive and review modified privilege log related to the February 22 fake email; correspond with C. Brennan, J. Caughey, and J. Millian re: same.
3/5/2010	15524	Baldrate, Brian C.	0.8	0.8	460.00	Spoliation: Confer with J. Millian and C. Brennan and discuss deposition of P. Gavin and spoliation motion; confer with N. Adams re: spoliation memorandum.
3/8/2010	15524	Baldrate, Brian C.	3.5	3.5	2,012.50	Spoliation - Prepare for call with client on spoliation motion; confer with N. Adams and C. Brennan re: spoliation motion and timeline; confer with J. Millian, E. Kobrick, J. Warin, and S. Medeiros re: case strategy in filing spoliation motion; receive, review, and edit spoliation memorandum; confer with J. Millian and C. Brennan re: case strategy related to memorandum and motion.
3/9/2010	15524	Baldrate, Brian C.	3.5	3.5	2,012.50	Spoliation - Confer with N. Adams re: spoliation outline for sanction motion; review and revise spoliation client memorandum; review and revise draft motion for enlargement of time to file reply on motion to compel; review SunTrust's opposition to motion to compel and outline potential reply.
3/10/2010	15524	Baldrate, Brian C.	4.7	4.7	2,702.50	Spoliation - Review and revise spoliation memorandum; finalize and submit motion for an enlargement of time on reply brief to motion to compel; confer with N. Adams on spoliation outline and additional case law research on scope of employment, fraud on the court; confer with J. Millian and C. Brennan on response to SunTrust's subpoena duces tecum to P. Gavin and revise letter accordingly.
3/11/2010	15524	Baldrate, Brian C.	2.2	2.2	1,265.00	Spoliation - Review, finalize, and send correspondence to SunTrust re: P. Gavin's deposition; review and revise spoliation motion outline; confer with N. Adams re: same; research Fifth Amendment issues related to M. Pettitt's invocation; review and revise spoliation memorandum.
3/12/2010	15524	Baldrate, Brian C.	3.2	3.2	1,840.00	Spoliation - Continue 5th Amendment prejudice research; confer with N. Adams re: sanction memorandum and sanction outline for motion; review and revise sanction memorandum; review and organize documents related to February 2008 email and P. Gavin's deposition; correspond with P. Gavin re: follow on call from deposition.
3/14/2010	15524	Baldrate, Brian C.	2	2	1,150.00	Spoliation - Edit sanction memorandum and draft reply to motion to compel; confer with C. Brennan re: same.
3/15/2010	15524	Baldrate, Brian C.	9.7	9.7	5,577.50	Spoliation - Review documents and deposition transcript of P. Gavin; confer with C. Brennan, J. Millian, and P. Gavin re: same; review SunTrust's opposition and continue drafting United Guaranty's reply.
3/16/2010	15524	Baldrate, Brian C.	10.7	10.7	6,152.50	Spoliation - Continue reviewing, revising, and drafting Reply; confer with J. Millian, C. Brennan, and W. Durrette (partial) re: same; discuss sanction memorandum with J. Millian and C. Brennan; confer with N. Adams re: sanction motion and revise and edit accordingly.
3/17/2010	15524	Baldrate, Brian C.	9	9	5,175.00	Spoliation - Review and revise reply brief; edit and review SunTrust's Exhibit C and draft section re: SunTrust's privilege claims; confer with J. Millian, C. Brennan, and J. Caughey re: finalizing reply; review, research, and revise case law for spoliation memorandum.
3/19/2010	15524	Baldrate, Brian C.	0.7	0.7	402.50	Confer with C. Brennan and J. Caughey (partial) in responding to P. Gavin deposition request; receive and review final spoliation memorandum to client.
3/22/2010	15524	Baldrate, Brian C.	1.2	1.2	690.00	Spoliation: Review and analyze sanctions memo including comments by W. Durrette; confer with C. Brennan and J. Caughey re: S. Thurman errata; confer with GDCIP re: same.
3/23/2010	15524	Baldrate, Brian C.	9.2	9.2	5,290.00	Confer with J. Caughey and C. Brennan re: case strategy; review and analyze claw back data, transcript from P. Gavin's deposition, and SunTrust's production demand letter; coordinate plan to review technical problem documents; confer with C. Brennan re: responding to SunTrust P. Gavin letter; conduct research on requested documents re: same; confer with C. Brennan and J. Millian re: case strategy re: motion to compel hearing; reply to motion to dismiss and discovery responses and disputes.
3/25/2010	15524	Baldrate, Brian C.	1	1	575.00	Confer with J. Caughey re: response to P. Gavin letter; confer with J. Millian re: case law related to spoliation briefs; receive and review new ECF case page from B. Gorman.
4/4/2010	15524	Baldrate, Brian C.	0.5	0.5	287.50	Review transcript from hearing on motion to compel.
4/5/2010	15524	Baldrate, Brian C.	0.5	0.5	287.50	Spoliation: Confer with C. Brennan and J. Millian re: status of P. Gavin's errata; discuss upcoming deposition dates and strategy for S. Thurman and J. Clack.
4/7/2010	15524	Baldrate, Brian C.	2.5	2.5	1,437.50	Spoliation: Confer with J. Millian and C. Brennan re: responsive documents on motion to compel, upcoming depositions, and case strategy; draft correspondence to SunTrust re: same; receive and review additional spoliation caselaw.
4/19/2010	15524	Baldrate, Brian C.	2.5	2.5	1,437.50	Spoliation: Confer with C. Brennan and J. Caughey re: SunTrust document production from motion to compel; receive and review documents re: same and draft response.
4/20/2010	15524	Baldrate, Brian C.	0.8	0.8	460.00	Spoliation: Confer with C. Brennan and draft correspondence to SunTrust re: production of emails related to the altered evidence.
4/21/2010	15524	Baldrate, Brian C.	0.8	0.8	460.00	Confer with C. Brennan and J. Caughey re: document review by contract attorneys and challenge of SunTrust's privilege log.



Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
4/22/2010	15524	Baldrate, Brian C.	2.3	2.3	1,322.50	Confer with C. Brennan and J. Caughey and discuss issues related to SunTrust's production; review and revise letter to SunTrust re: privilege log; receive and review additional SunTrust production and draft response to SunTrust's letter seeking additional document production; confer with C. Brennan and J. Millian re: same.
4/30/2010	15524	Baldrate, Brian C.	0.8	0.8	460.00	(Spoliation) Continue review of SunTrust's documents responding to United Guaranty's motion to compel.
5/3/2010	15524	Baldrate, Brian C.	0.5	0.5	287.50	Spoliation: Review and analyze motion to compel transcript and documents and discuss deposition strategy; review SunTrust redacted documents from fake email production to determine whether to challenge redactions.
5/7/2010	15524	Baldrate, Brian C.	3.5	3.5	2,012.50	Spoliation: Receive and review SunTrust's privilege log for fake emails and review document for challenge; review SunTrust clawback documents re: same.
5/11/2010	15524	Baldrate, Brian C.	3	3	1,725.00	Spoliation: Review all documents related to the Fake February 2006 email.
5/12/2010	15524	Baldrate, Brian C.	2.3	2.3	1,322.50	Spoliation: Review and analyze key emails in preparation for sanctions motion; confer with C. Brennan and J. Caughey re: same.
5/13/2010	15524	Baldrate, Brian C.	0.5	0.5	287.50	Spoliation: Confer with J. Caughey re: organizing and assembling spoliation documents; begin additional review of same.
5/18/2010	15524	Baldrate, Brian C.	5.3	5.3	3,047.50	Spoliation: Draft SunTrust letter enumerating deficiencies in SunTrust's production, privilege log, and completeness related to United Guaranty's motion to compel documents; confer with C. Brennan and J. Caughey re: same; prepare for depositions with S. Hovatter.
5/19/2010	15524	Baldrate, Brian C.	3.8	3.8	2,185.00	Spoliation: Review documents and prepare for deposition of D. Hovatter.
5/20/2010	15524	Baldrate, Brian C.	0.5	0.5	287.50	Spoliation: Review D. Hovatter documents; draft notice of deposition and serve on SunTrust; confer with C. Brennan and J. Millian and discuss deposition strategy.
5/21/2010	15524	Baldrate, Brian C.	5.3	5.3	3,047.50	Spoliation: Draft subpoena duces tecum for J. Gold; conduct research related to deposition of opposing counsel in case; confer with J. Millian and W. Durrette re: same; receive and review correspondence from SunTrust re: responses to United Guaranty's motion to compel and prepare responses.
5/24/2010	15524	Baldrate, Brian C.	1.5	1.5	862.50	Spoliation: Confer with J. Millian (partial), C. Brennan, and J. Caughey and prepare for depositions of D. Hovatter, S. Thurman, and J. Clack; review SunTrust documents related to spoliation issues.
5/25/2010	15524	Baldrate, Brian C.	2.8	2.8	1,610.00	Spoliation: Prepare for deposition of S. Thurman and J. Clack and draft notices of deposition re: same; review and revise subpoena duces tecum and review documents for J. Gold; confer with C. Brennan and J. Caughey re: same.
5/26/2010	15524	Baldrate, Brian C.	4.5	4.5	2,587.50	Spoliation: Confer with J. Millian and C. Brennan and discuss deposition of D. Hovatter, and upcoming depositions of S. Thurman and J. Clack; receive and review court order re: motion to compel; confer with R. Mastro, C. Brennan, and J. Millian and discuss case strategy related to sanctions and additional discovery; confer with R. Mastro and discuss notes of S. Thurman and subpoena of J. Gold; review documents and confer with C. Brennan and J. Caughey in preparation of S. Thurman deposition.
5/27/2010	15524	Baldrate, Brian C.	3.5	3.5	2,012.50	Spoliation: Confer with R. Mastro and discuss spoliation case strategy; review and identify documents related to Court's order of Thurman notes; review documents and prepare for Thurman deposition; receive and review additional notes from S. Thurman produced from Reed Smith and confer with team re: same.
5/28/2010	15524	Baldrate, Brian C.	2.5	2.5	1,437.50	Complete package to R. Mastro; continue review of TAC; correspond with C. Brennan and J. Caughey re: chronology and receipt of documents from SunTrust.
5/31/2010	15524	Baldrate, Brian C.	1.8	1	575.00	Review transcript from status conference; confer with C. Brennan and J. Caughey re: Thurman notes; continue preparation for depositions; review and edit request for admissions.
6/1/2010	15524	Baldrate, Brian C.	5.3	5.3	3,047.50	Spoliation: Review, organize, and analyze documents in preparation for deposition of S. Thurman and J. Clack; confer with R. Mastro re: case progress and key documents related to sanctions issue.
6/2/2010	15524	Baldrate, Brian C.	15.3	15.3	8,797.50	Spoliation: Prepare for deposition of S. Thurman including travel to Richmond; review key documents and issues; discuss strategy with J. Millian; participate in deposition of S. Thurman; confer with J. Millian and discuss strategy for J. Clack; review and analyze documents and continue preparation for deposition of J. Clack; confer with J. Caughey and conduct further research on S. Thurman's explanation re: altered documents and SunTrust's electronic review.
6/3/2010	15524	Baldrate, Brian C.	8.8	8.8	5,060.00	Spoliation: Continue preparation for J. Clack deposition including the incorporation of research related to SunTrust's electronic review of altered emails; attend deposition of J. Clack; confer with J. Millian and discuss strategy; correspond with SunTrust re: addition sanctions depositions; confer with R. Maestro and provide update.
6/7/2010	15524	Baldrate, Brian C.	1.8	1.8	1,035.00	Spoliation: Receive and review Thurman deposition; confer with J. Millian and C. Brennan on depositions of J. Gold and S. Edmunds.
6/8/2010	15524	Baldrate, Brian C.	0.5	0.5	287.50	Spoliation: Confer with T. Dupree re: case strategy for sanctions motions; correspond with R. Mastro re: sanctions update; confer with J. Caughey and review and revise sanctions notebook.
6/9/2010	15524	Baldrate, Brian C.	1	1	575.00	Spoliation: Review and revise SunTrust sanctions binder; confer with J. Caughey re: same; receive and review objections to subpoena duces tecum and coordinate to receive additional documents.
6/10/2010	15524	Baldrate, Brian C.	2.5	2.5	1,437.50	Spoliation: Receive and review objections and responsive documents from J. Gold; conduct initial review of sanctions outline; correspond with T. Dupree and provide sanctions update; confer with J. Caughey and C. Brennan in creating and editing sanctions binder.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
6/11/2010	15524	Baldrate, Brian C.	5.5		-	Review counterclaim, analyze key document chronology, and prepare for count II claims; develop interview strategy.
6/11/2010	15524	Baldrate, Brian C.	1	1	575.00	Spoliation: Review and revise sanctions binder; confer with J. Caughey re: same; review and edit sanctions outline; confer with C. Brennan re: sanctions issues.
6/13/2010	15524	Baldrate, Brian C.	0.3		-	Correspond with United Guaranty and send draft answer and draft responses to requests for admission.
6/13/2010	15524	Baldrate, Brian C.	3.5	3.5	2,012.50	Spoliation: Review and revise sanctions outline; confer with J. Caughey and re: same.
6/14/2010	15524	Baldrate, Brian C.	6.3		-	Confer with C. Brennan and J. Millian re: Requests for Admission and review of electronic documents; review, finalize, and file answer; confer with J. Caughey and file.
6/14/2010	15524	Baldrate, Brian C.	4	4	2,300.00	Spoliation: Confer with J. Caughey re: sanctions outline; review and revise outline and send to team; review deposition transcripts of M. Pettitt in preparation for sanctions motion and follow-on depositions; correspond with C. Seltzer re: M. Pettitt; conduct follow-on research of adverse inferences law.
6/15/2010	15524	Baldrate, Brian C.	5.5		-	Correspond with S. Millard re: Reporting Program Manuals and responses to requests for admission; confer with P. Gavin and A. Siesling re: same; correspond with J. Millian and C. Brennan and provide case update; correspond with S. Medeiros and B. Hall and provide status update; meet with A. Lucas and J. Caughey and discuss counterclaim.
6/15/2010	15524	Baldrate, Brian C.	4.3	4.3	2,472.50	Spoliation: Review and revise sanctions outline; confer with T. Dupree, R. Mastro, W. Durette, and J. Caughey re: sanctions motion and strategy; confer with C. Seltzer re: follow-on deposition of M. Pettitt; confer with N. Adams re: economic sanctions and issue preclusion; conduct further research on issue preclusion and fifth amendment.
6/16/2010	15524	Baldrate, Brian C.	4.8		-	Confer with S. Millard and B. Hall re: requests for admission; confer with A. Siesling, P. Gavin, and A. Atkins and discuss reporting program manual; review and revise responses to requests for admission; begin drafting affirmative discovery; confer with K. Guillermo re: document production issues and case preparation; finalize and send responses to requests for admission.
6/16/2010	15524	Baldrate, Brian C.	5.5	5.5	3,162.50	Spoliation: Receive and review additional documents from Reed Smith and Anderson Kill; confer with C. Seltzer re: M. Pettitt deposition; confer with J. Caughey and assist in drafting sanctions motion; conduct further research on M. Pettitt's deposition.
6/17/2010	15524	Baldrate, Brian C.	4.5		-	Confer with J. Caughey and A. Lucas re: counterclaim and ripeness issues; confer with C. Brennan and provide case update on answer and counterclaim and requests for admission; develop case strategy re: affirmative discovery and count II claims; review key document chronology.
6/17/2010	15524	Baldrate, Brian C.	5.8	5.8	3,335.00	Spoliation: Review and pull documents for depositions of M. Pettitt and J. Caughey; confer with J. Caughey re: same; review and revise sanctions motion and confer with C. Brennan and J. Caughey re: same.
6/18/2010	15524	Baldrate, Brian C.	0.8		-	Receive and review additional productions and further requests from Reed Smith; correspond with J. Caughey and C. Guillermo and review new documents; review additional claw back material.
6/18/2010	15524	Baldrate, Brian C.	7.5	7.5	4,312.50	Spoliation: Review, revise, and edit sanctions motion; confer with J. Caughey re: further deposition research and preparation for depositions of J. Gold and M. Pettitt.
6/20/2010	15524	Baldrate, Brian C.	1.5	1.5	862.50	Spoliation: Confer with J. Caughey re: sanctions motion and discuss modifications to motion; review and revise motion and outline.
6/21/2010	15524	Baldrate, Brian C.	1.5		-	Receive and respond to discovery requests from SunTrust; confer with C. Brennan and J. Caughey re: document production issues and clawback of documents.
6/21/2010	15524	Baldrate, Brian C.	8.5	8.5	4,887.50	Spoliation: Review, revise, and edit sanctions motion; confer with T. Dupree, C. Brennan, and J. Caughey re: same; research fifth amendment case law; correspond with N. Adams re: additional case research.
6/22/2010	15524	Baldrate, Brian C.	15.3	15.3	8,797.50	Spoliation: Confer with J. Millian and provide case update; confer with T. Dupree and discuss sanctions issues; confer with J. Caughey and C. Brennan regarding researching and revising sanctions motion; review, revise, and draft sanctions motion to submit to T. Dupree.
6/23/2010	15524	Baldrate, Brian C.	1.5		-	Review anticipatory breach memorandum; confer with A. Lucas, C. Brennan, and J. Caughey re: same; schedule logistics and begin planning for follow-on meetings with United Guaranty employees; discuss contract attorney issues and responses to pending SunTrust discovery requests; begin preparation for defending employee depositions.
6/23/2010	15524	Baldrate, Brian C.	6.8	6.8	3,910.00	Spoliation: Review and finalize draft sanctions and send to T. Dupree; confer with J. Caughey and C. Brennan re: J. Gold depositions; review and revise documents related to depositions; correspond with T. Dupree and discuss sanctions issues.
6/24/2010	15524	Baldrate, Brian C.	2.8		-	Review case chronology; review additional productions and correspondence from Reed Smith and draft discovery responses; confer with J. Caughey and C. Brennan and discuss discovery issues including electronic vendor issues and contract attorney work.
6/24/2010	15524	Baldrate, Brian C.	4	4	2,300.00	Spoliation: Confer with T. Dupree re: sanctions motion; research and revise issues; review documents and further prepare for depositions of J. Gold; confer with J. Caughey and C. Brennan re: same.
6/25/2010	15524	Baldrate, Brian C.	3.5		-	Confer with C. Brennan and discuss case preparation and strategy; confer with J. Millian and discuss case update; review documents and prepare for meetings with A. Seisling, P. Gavin, and K. Corman; confer with P. Gavin and J. Hanflink and discuss count II claims; review and organize count II claim files.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
6/25/2010	15524	Baldrate, Brian C.	3.3	3.3	1,897.50	Spoilation: Confer with N. Adams and discuss sanctions research; correspond with T. Dupree re: various sanctions issues including issue preclusion; conduct research re: same; confer with J. Caughey re: J. Gold depositions and deposition excerpts.
6/27/2010	15524	Baldrate, Brian C.	1.8	1.8	1,035.00	Spoilation: Confer with R. Mastro and discuss sanctions motion; confer with J. Caughey and discuss sanctions timeline; review and analyze draft statement of facts from T. Dupree and correspond re: same.
6/28/2010	15524	Baldrate, Brian C.	3.8	-	-	Prepare binders for meeting with United Guaranty personnel; read, review, and revise case update and case chronology; set up meeting with R. Hughes; review documents related to K. Corman in preparation for tomorrow's meeting.
6/28/2010	15524	Baldrate, Brian C.	2.5	2.5	1,437.50	Spoilation: Confer with J. Caughey on sanctions timeline; review and revise memorandum re: same; confer with C. Brennan on sanctions motion and discussion with T. Dupree; create subpoena for M. Pettitt and revised notice of deposition for S. Edmunds and correspond re: same; confer with J. Millian, C. Brennan, and J. Caughey re: deposition of J. Gold.
6/29/2010	15524	Baldrate, Brian C.	1	1	575.00	Spoilation: Prepare for depositions of S. Edmunds and M. Pettitt; confer with J. Caughey re: same; confer with B. Hall, J. Millian, and C. Brennan and provide case update on sanctions depositions of J. Gold and upcoming depositions of S. Edmunds and M. Pettitt.
6/29/2010	15524	Baldrate, Brian C.	10.5	-	-	Travel to United Guaranty with C. Brennan while preparing for meetings and developing case strategy; meet and confer P. Gavin, B. Hall, and S. Medeiros; confer with J. Millian and C. Brennan and discuss strategy; review and analyze claim II loan files and United Guaranty's electronic data platform; confer with C. Brennan, review notes, and prepare for tomorrow's meetings with K. Corman, R. Hughes, and A. Seisling.
6/30/2010	15524	Baldrate, Brian C.	9.5	-	-	Meet with K. Corman, A. Seisling, and R. Hughes and discuss case strategy; correspond with R. Holzheimer and prepare response to discovery issues; confer with C. Brennan and analyze SunTrust claims; review documents and computer data bases with C. Brennan and P. Gavin; return travel from North Carolina; review and revise notes and discuss case strategy with C. Brennan.
6/30/2010	15524	Baldrate, Brian C.	3	3	1,725.00	Spoilation: Correspond with T. Dupree re: sanctions motion; confer with J. Caughey re: document preparation for S. Edmunds and J. Gold depositions; correspond with R. Mastro, T. Dupree, and J. Millian re: sanctions issues; confer with J. Caughey and C. Brennan re: transcripts of J. Gold key experts and preparation of deposition of M. Pettitt and S. Edmunds.
7/1/2010	15524	Baldrate, Brian C.	5.8	3.3	1,079.61	Confer with R. Mastro re: case strategy; confer with T. Dupree re: Virginia professional ethics research and draft sanctions motion; review documents and prepare for the depositions of S. Edmunds and M. Pettitt; review SunTrust correspondence; meet with J. Caughey and C. Brennan and draft ESI response letter; discuss contract attorney issues and update chronology.
7/2/2010	15524	Baldrate, Brian C.	9.8	5.8	1,973.78	Prepare for depositions of S. Edmunds and M. Pettitt; correspond with J. Millian, C. Brennan, and J. Caughey re: same; confer with T. Dupree and N. Adams and conduct research re: sanctions motion; receive and review sanctions motion; Continue case preparation; confer with J. Millian and C. Brennan and discuss case strategy; receive discovery demand from SunTrust; research issue and edit reply correspondence; receive and review SunTrust privilege log and additional SunTrust discovery issues; conduct research on expert reports and key case milestones.
7/5/2010	15524	Baldrate, Brian C.	7.3	-	-	Prepare for SunTrust's upcoming sanctions depositions; confer with C. Seltzer re: upcoming deposition of M. Pettitt; confer with C. Brennan and J. Caughey re: deposition of S. Edmunds and documents for M. Pettitt; review discovery correspondence between SunTrust and UG.
7/6/2010	15524	Baldrate, Brian C.	11	10	5,227.27	Confer with T. Dupree re: sanctions motion research; confer with J. Caughey and N. Adams re: same; prepare for deposition of M. Pettitt; review new potential fake Pettitt email; confer with B. Hall, W. Durette, and C. Brennan and provide case update; confer with J. Caughey re: discovery issues; receive additional correspondence from SunTrust re: additional loan files.
7/7/2010	15524	Baldrate, Brian C.	14.6	12.8	6,452.60	Review and analyze potential new fake Pettitt email; confer with J. Caughey and K. Guillermo re: tracking metadata; prepare for, and participate in, deposition of M. Pettitt; confer with J. Caughey and C. Brennan re: case strategy concerning additional fabricated evidence; confer with N. Adams re: Georgia ethics rules and sanctions motion; confer with J. Caughey re: sanctions motion research; confer with J. Millian and C. Brennan re: discovery conference with SunTrust; develop discovery plan and case chronology; confer with J. Caughey re: additional document production issues; review of key documents and privilege logs.
7/8/2010	15524	Baldrate, Brian C.	7.8	3.8	1,064.49	Receive and review deposition of S. Edmunds; confer with T. Dupree re: sanctions motion research and brief preparation; confer with J. Caughey and N. Adams on follow-on sanctions research; correspond with R. Mastro re: additional potential fake documents; confer with J. Millian, C. Brennan, and J. Caughey re: sanctions motion research related to new fake emails; review and analyze updated chronology; confer with C. Brennan and J. Caughey re: review of SunTrust's second set of requests for admissions; review privilege log; confer with J. Millian, C. Brennan, and J. Caughey and discuss case strategy and document production issues.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
7/9/2010	15524	Baldrate, Brian C.	6.8	3.3	920.85	Review documents re: SunTrust's documents to identify further doctored emails and analyze potential current doctored email; review and analyze SunTrust privilege log; confer with J. Caughey and C. Brennan re: same; confer with N. Adams and T. Dupree: follow-on sanctions research; correspond with W. Durette re: same; confer with C. Brennan and discuss strategy; correspond with S. Millar and receive waiver of premiums documents; review and analyze SunTrust's second request for production of documents; confer with J. Millian and C. Brennan and discuss case strategy.
7/12/2010	15524	Baldrate, Brian C.	11.3		-	Confer with J. Caughey and review additional potential fake documents; confer with T. Dupree and discuss various sanctions issues; review and receive additional brief; receive and review M. Pettitt deposition and circulate deposition transcripts to team; correspond with W. Durette and discuss case strategy; confer with N. Adams re: additional sanctions law research; confer with K. Guillermo re: identifying further altered documents; confer with S. Millar re: request for admissions and tracking numerous claims dispute information; review requests for admissions and begin drafting draft objections; confer with C. Brennan and discuss case strategy; review potential expert issues and counter-claim considerations; confer with J. Caughey and C. Brennan and discover outstanding discovery issues and responses to SunTrust demands.
7/13/2010	15524	Baldrate, Brian C.	11.3	3.8	734.78	Confer with N. Adams on sanctions law research; review and revise research re: same; review and suggest comments to sanctions brief and begin work on statement of facts; confer with T. Choe, K. Guillermo, C. Brennan, and J. Caughey and discuss discovery and production issues; review and revise objections to SunTrust's second requests for admission; confer with C. Brennan re: experts; confer with J. Millian re: case strategy including counterclaim, experts, and requests for admissions.
7/14/2010	15524	Baldrate, Brian C.	9	5.5	1,932.64	Receive claims files from United Guaranty; confer with J. Caughey and C. Brennan re: discovery issues; finalize and correspond with J. Millian re: draft objections to requests for admission; receive and review discovery demands from SunTrust; confer with J. Millian and C. Brennan and prepare strategy and draft response re: same; begin drafting request for admissions; Revise and edit statement of facts identifying key citations; confer with J. Caughey and C. Brennan (partial) re: same; conduct further review and analysis on SunTrust's privilege log re: M. Pettitt; correspond with J. Millian re: same.
7/15/2010	15524	Baldrate, Brian C.	9.8	5.8	1,973.78	Continue to refine, edit, and analyze statement of facts; confer with T. Dupree re: chronology; confer with J. Millian re: sanctions motion, memorandum, index, exhibit, and chronology; confer with KPMG re: declaration and forensic analysis; confer with C. Brennan and J. Caughey re: confidential documents; review and analyze sanctions documents and key exhibits; confer with C. Brennan and J. Millian on discovery issues and case strategy; revise and circulate objections to requests for admissions; research SunTrust's privilege log; draft privilege objection letter and order to the Court; conduct expert research.
7/16/2010	15524	Baldrate, Brian C.	5.5	2	418.18	Prepare for and participate in status conference on discovery with the Court; continue expert consultant review; confer with J. Caughey and C. Brennan re: action items; finalize and submit objections to SunTrust's requests for admission; receive and review additional SunTrust production and discovery requests; confer with J. Millian, C. Brennan, and J. Caughey re: statement of facts and sanctions motion; discuss KPMG affidavit and P. Gavin affidavit; prepare subpoena plan for M. Dumville and C. Stumbo; research and analyze May 1 email trail.
7/20/2010	15524	Baldrate, Brian C.	0.5	0.5	287.50	Confer with T. Dupree and N. Adams re: research on sanctions motions related to directed verdicts.
7/21/2010	15524	Baldrate, Brian C.	0.8	0.8	460.00	Review sanctions brief and additional fake emails; correspond with C. Brennan re: case update.
7/23/2010	15524	Baldrate, Brian C.	0.5	0.5	287.50	Review sanctions documents including additional potentially altered emails.
7/26/2010	15524	Baldrate, Brian C.	1.3	0.8	283.08	Review subpoenas from SunTrust; review expert testimony information and responses to SunTrust's requests for admission; review potential altered documents; correspond with R. Mastro regarding both issues; review draft declarations.
7/27/2010	15524	Baldrate, Brian C.	1.5		-	Receive and review transcript from July 16 status conference; review claims information related to our responses to requests for admission and subpoena duces tecum requests to United Guaranty entities.
7/28/2010	15524	Baldrate, Brian C.	8.8		-	Review DU expert consultation notes; confer with J. Caughey re: discovery issues and responses to subpoena duces tecum; confer with C. Brennan re: case developments including responses to requests for admission; draft motion to dismiss counts of our counterclaim and deposition of M. Dumville; confer with J. Millian re: case strategy; draft and send correspondence to S. Medeiros; confer with B. Hall and C. Brennan re: case issues; correspond with SunTrust re: settlement conference; begin drafting affirmative discovery and responding to SunTrust's second set of discovery.
7/29/2010	15524	Baldrate, Brian C.	7.8	1	73.72	Confer with J. Caughey re: statement of facts; receive and review matrix guidelines; review additional documents searching for fake emails; confer with C. Brennan and J. Caughey re: discovery issues; draft correspondence to SunTrust re: privilege log; continue response to SunTrust subpoenas to UGC and UGS; begin drafting responses to SunTrust's second set of interrogatories and production of documents; receive and review expert contact information and discuss case strategy with C. Brennan.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
7/30/2010	15524	Baldrate, Brian C.	9.3	0.5	15.46	Confer with J. Millian and C. Brennan re: sanctions motion and strategy going forward; confer with C. Brennan and J. Caughey re: discovery issues and responses to requests for admission, production of documents, and interrogatories; draft, edit, and send correspondence re: same; confer with J. Millian and C. Brennan and discuss case strategy; receive and conduct initial review of expert reports; review subpoena responses and confer with J. Caughey re: interplay between subpoenas and production of documents responses; correspond with N. Bronni re: same.
8/2/2010	15524	Baldrate, Brian C.	4		-	Review and research potential experts; confer with N. Bronni and C. Brennan and draft subpoena response; confer with C. Brennan and discuss case strategy; receive and review data on other UG lenders with IOF combo loans; correspond with J. Millian re: counterclaim and other lenders with IOF combo loans; receive and review draft declaration from KPMG; confer with C. Brennan re: response to sanctions motion.
8/3/2010	15524	Baldrate, Brian C.	13.5	2.5	266.20	Receive and review update from K. Guillermo on other potentially doctored emails; confer with C. Brennan and K. Guillermo re: same; review and analyze key Pettitt emails; review and interpret SunTrust expert reports; confer with N. Bronni on subpoena response; review and finalize subpoena response; correspond with J. Millian, C. Brennan, and N. Bronni in responding to various subpoenas; finalize and send correspondence re: same; receive and review claims files and documents from United Guaranty.
8/4/2010	15524	Baldrate, Brian C.	11.6	3.3	539.81	Confer with T. Dupree re: sanctions motion and doctored emails; review documents and confer with K. Guillermo re: same; draft outline of motion for leave to file a sanctions brief under EDVA local rules; confer with N. Bronni re: same; review and revise draft subpoena response of UGS; confer with C. Brennan and T. Sabalewski re: same; review and analyze expert reports; confer with numerous potential experts; discuss case strategy and expert strategy with J. Millian and C. Brennan; review and edit response to subpoena to UGS; confer with N. Bronni re: case strategy; confer with A. Seisling re: responses to SunTrust's production of document requests.
8/5/2010	15524	Baldrate, Brian C.	10.3		-	Confer with A. Seisling re: UGS subpoena and key documents; research claims files in responding to production of document and interrogatory requests; review and revise memorandum, draft order, and sanctions brief; confer with J. Millian and N. Bronni re: various sanctions issues including letter to SunTrust; redaction of privilege information, verification of key sanctions documents, completion of draft motion, and memorandum to exceed page limit; discuss sanctions strategy and alternatives with J. Millian.
8/5/2010	15524	Baldrate, Brian C.	0	8.5	4,887.50	Spoliation: Review and revise memorandum, draft order, and sanctions brief; confer with J. Millian and N. Bronni re: various sanctions issues including letter to SunTrust; redaction of privilege information, verification of key sanctions documents, completion of draft motion, and memorandum to exceed page limit; discuss sanctions strategy and alternatives with J. Millian.
8/6/2010	15524	Baldrate, Brian C.	0.5	0.5	287.50	Confer with J. Caughey, N. Bronni, and C. Brennan re: sanctions issues and research.
8/10/2010	15524	Baldrate, Brian C.	0.5		-	Confer with J. Caughey and C. Brennan re: counterclaim, deposition schedules, case progress, and Rule 26 disclosures.
8/11/2010	15524	Baldrate, Brian C.	9.5	5	1,513.16	Confer with C. Brennan and J. Caughey to update KPMG declaration and Gavin declaration and to finalize sanctions brief; review and finalize; review and research responses to UGS subpoena, discovery responses, expert report issues, and deposition preparation.
8/12/2010	15524	Baldrate, Brian C.	10.3	4.3	1,032.21	Review and revise Gavin declaration; confer with J. Caughey and C. Brennan re: sanctions motion task list, including finalizing draft order, appendix, motion, and memorandum; confer with J. Caughey re: updating and finalizing appendix; review and revise memorandum; confer with R. Mastro re: case update; confer with SunTrust regarding UGS subpoena and objections to documents designated confidential; review and prepare for defending deposition of P. Gavin; confer with United Guaranty and develop responses to SunTrust discovery requests; confer with N. Bronni re: same; confer with C. Brennan and J. Millian re: case strategy, expert reports, and deposition preparation.
8/13/2010	15524	Baldrate, Brian C.	8.8	4.5	1,323.15	Receive and review SunTrust's opposition to United Guaranty's request to exceed page limitations and file on the public record; review, revise, and file reply; confer with J. Millian, C. Brennan, and S. Medieros re: same; review and revise T. Keegandecaration and P. Gavin declaration and transmit same; review and revise discovery responses and send drafts to client; receive and review information related to response to UGS subpoena; prepare for upcoming depositions; review and receive MCL information and expert documents.
8/15/2010	15524	Baldrate, Brian C.	0.8	0.8	460.00	Confer with J. Caughey and C. Brennan re: sanctions motion and exhibit preparation; correspond with P. Gavin re: declaration.
8/16/2010	15524	Baldrate, Brian C.	10.6		-	Confer with N. Bronni re: UGS subpoena, privilege log letter, and requests for admission and interrogatories; confer with J. Caughey and conduct P. Gavin preparation; confer with J. Millian, C. Brennan, and S. Millar re: deposition preparation; work with KPMG, C. Brennan, and J. Caughey re: completion of supplemental document production; finalize and submit responses to interrogatories and production of document requests; review and revise sanctions exhibits; confer with J. Caughey and J. Millian re: updating sanctions brief.
8/16/2010	15524	Baldrate, Brian C.	0	1.8	1,035.00	Spoliation: Review and revise sanctions exhibits; confer with J. Caughey and J. Millian re: updating sanctions brief.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
8/17/2010	15524	Baldrate, Brian C.	8		-	Confer with B. Hall and J. Millian re: case update, including discussion of sanctions motion, experts, and depositions; confer with T. Bailey, A. Seisling, and N. Bronni re: UGS subpoenas; correspond with J. Millian and C. Brennan re: same; review documents and prepare for deposition of P. Gavin; confer with J. Caughey re: same; confer with N. Bronni re: affirmative discovery; confer with C. Brennan re: deposition schedule.
8/18/2010	15524	Baldrate, Brian C.	13.6		-	Prepare for deposition of P. Gavin including travel to United Guaranty; confer with J. Caughey; review documents and prior testimony; meet with S. Millard (partial), J. Caughey, and P. Gavin re: deposition strategy; review and revise declaration; prepare for follow-on meeting; begin preparation and review of documents of C. Light in preparation for her deposition; receive and review order granting permission to file sanctions motion under seal; confer with team re: under seal requirement; read and review current version of motion incorporating recent Gavin declaration; review and approve Gavin exhibit and declaration.
8/18/2010	15524	Baldrate, Brian C.	0	1.8	1,035.00	Receive and review order granting permission to file sanctions motion under seal; confer with team re: under seal requirement; read and review current version of motion incorporating recent Gavin declaration; review and approve Gavin exhibit and declaration.
8/19/2010	15524	Baldrate, Brian C.	10.8		-	Confer with P. Gavin and J. Caughey (partial) re: deposition preparation including focus on prior deposition and documents; confer with S. Millard re: case developments and strategy; meet and confer with C. Light re: upcoming deposition; discuss and review documents and chronology; return travel to Gibson Dunn; confer with P. Gavin re: finalizing declaration; confer with T. Dupree re: sanctions motion; correspond with J. Caughey and C. Brennan re: sanctions motion preparation, including memorandum, motion, order, and exhibits.
8/20/2010	15524	Baldrate, Brian C.	5.5		-	Confer with N. Bronni and C. Brennan re: additional information in responding to SunTrust's interrogatories; confer with J. Caughey and KPMG in finalizing production; confer with C. Brennan re: expert reports; receive and review expert reports; confer with J. Caughey re: completion of P. Gavin preparation and preparation for C. Light and B. Lentz deposition; review and revise chronology and coordinate with J. Caughey and contract attorneys to update the chronology.
8/21/2010	15524	Baldrate, Brian C.	3		-	Confer with J. Millian and J. Caughey re: P. Gavin deposition preparation; continue review of expert reports.
8/22/2010	15524	Baldrate, Brian C.	0.5		-	Correspond with J. Millian and C. Brennan re: deposition strategy and sanctions related case strategy.
8/23/2010	15524	Baldrate, Brian C.	0	0.5	287.50	Confer with J. Caughey re: sanctions motion distribution, preparation for filing reply brief to maintain under seal, and filing e-brief.
8/23/2010	15524	Baldrate, Brian C.	4.5		-	Review draft interrogatory responses; confer with N. Bronni re: same; review deposition calendar and confer with J. Caughey re: deposition preparation, additional production issues, and affirmative discovery requests and settlement memorandum; confer with J. Caughey re: sanctions motion distribution, preparation for filing reply brief to maintain under seal, and filing e-brief.
8/25/2010	15524	Baldrate, Brian C.	1.5		-	Review and discuss interrogatories, request for admission, and responses to SunTrust interrogatories with J. Caughey and N. Bronni; confer with J. Caughey and C. Brennan re: case strategy and deposition timeline and outlines.
8/26/2010	15524	Baldrate, Brian C.	3.3		-	Receive and review SunTrust correspondence on document production issues; confer with J. Caughey and C. Brennan re: same; confer with J. Caughey re: first lien loan information resulting from her meeting with C. Smith re: DU issues and deposition outline for P. Mangelsdorf and B. Wheaton.
8/27/2010	15524	Baldrate, Brian C.	8.8		-	Correspond with S. Millard and L. Ertel re: restoration of lost archive data; review and revise responses to interrogatories; confer with N. Bronni re: same; review, revise, and finalize affirmative discovery including requests for admissions, interrogatories, and production of document requests; confer with J. Caughey and C. Brennan re: same; confer with C. Brennan and develop deposition template; confer with C. Brennan and J. Millian and discuss case strategy and deposition timeline.
8/28/2010	15524	Baldrate, Brian C.	1		-	Review Harmon documents in preparation for deposition.
8/29/2010	15524	Baldrate, Brian C.	1.5		-	Correspond with United Guaranty re: archived P. Gavin data; receive and review deposition schedule; prepare for depositions; correspond with C. Brennan and J. Caughey re: deposition preparations; correspond with T. Sabalewski re: new deposition changes and production of document issues.
8/30/2010	15524	Baldrate, Brian C.	8.5		-	Confer with R. Bronni and R. Hughes re: interrogatory responses; confer with J. Caughey re: deposition predation and begin drafting master deposition outline template; confer with C. Brennan re: deposition scheduling; confer with J. Millian re: discovery responses; draft, revise, and circulate draft responses to United Guaranty; begin deposition preparation for P. Mangelsdorf; correspond with C. Brennan re: settlement memorandum.
8/31/2010	15524	Baldrate, Brian C.	9.5		-	Conduct deposition preparation of P. Mangelsdorf; review documents and confer with S. Millard and N. Bronni re: interrogatory responses; confer with J. Caughey re: deposition preparation; confer with T. Sabalewski re: deposition schedule; receive and review SunTrust letters concerning ESI, production, and expert rebuttal reports; work with N. Bronni on UGS subpoena response and production; work with GDCIP and M. Smith on electronic sanctions brief.
8/31/2010	15524	Baldrate, Brian C.	0	0.5	287.50	Work with GDCIP and M. Smith on electronic sanctions brief.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
9/1/2010	15524	Baldrate, Brian C.	9.8		-	Confer with J. Millian re: case strategy, deposition of B. Lentz and P. Mangelsdorf, and settlement memorandum; confer with J. Caughey re: same; review SunTrust motion to file under seal; confer with J. Conn, T. Dupree, and J. Caughey and discuss response strategy; create and provide outline and key documents to J. Conn.
9/1/2010	15524	Baldrate, Brian C.	0	2.7	1,581.25	Spoliation: Review SunTrust motion to file under seal; confer with J. Conn, T. Dupree, and J. Caughey and discuss response strategy; create and provide outline and key documents to J. Conn.
9/2/2010	15524	Baldrate, Brian C.	13.3		-	Review and revise settlement memorandum; confer with N. Bronni re: privilege log letter to SunTrust and UGS subpoena response; correspond with S. Millar re: litigation hold and electronic data issues; travel to Atlanta and conduct deposition preparation for P. Mangelsdorf; review expert rebuttal reports and discuss expert issues with C. Brennan; confer with J. Caughey re: reply brief; review and revise appendix and factual section; confer with J. Conn and discuss motion.
9/2/2010	15524	Baldrate, Brian C.	0	2.5	1,437.50	Spoliation: Confer with J. Caughey re: reply brief; review and revise appendix and factual section; confer with J. Conn and discuss motion.
9/3/2010	15524	Baldrate, Brian C.	9.6		-	Prepare for and attend deposition of P. Mangelsdorf; correspond with J. Millian and S. Millard re: electronic data; return travel including providing deposition update, reviewing settlement memorandum, and SunTrust demand letter; confer with J. Caughey, C. Brennan, and J. Millian re: sanctions under seal reply.
9/3/2010	15524	Baldrate, Brian C.	0	0.7	431.25	Spoliation: Confer with J. Caughey, C. Brennan, and J. Millian re: sanctions under seal reply.
9/7/2010	15524	Baldrate, Brian C.	3.3		-	Confer with J. Caughey re: deposition preparation; correspond with C. Brennan re: deposition scheduling and settlement conference; review settlement material; begin deposition preparation for C. Overby.
9/8/2010	15524	Baldrate, Brian C.	9.5		-	Confer with J. Millian and discuss case strategy; review documents and prepare for deposition of C. Overby; travel to Richmond and confer with J. Caughey and C. Brennan re: document production issues, settlement conference, and deposition strategy.
9/9/2010	15524	Baldrate, Brian C.	13		-	Prepare for and take deposition of C. Overby; confer with W. Durette and discuss case progress; confer with J. Caughey and C. Brennan re: deposition scheduling; review documents and prepare for deposition of S. Lutton; confer with S. Huber re: deposition and case status.
9/10/2010	15524	Baldrate, Brian C.	11		-	Prepare for and take deposition of S. Lutton; confer with SunTrust and S. Huber re: deposition planning and scheduling; return travel to D.C. and discuss case strategy and developments with J. Millian; confer with J. Caughey and C. Brennan and discuss discovery issues and settlement conference preparation.
9/12/2010	15524	Baldrate, Brian C.	4.5		-	Travel to Richmond; review settlement documents and prepare for settlement conference; meet and confer with J. Millian, D. Walker, C. Brennan, J. Bryant, and J. Caughey re: settlement preparations; review and revise deposition schedules.
9/13/2010	15524	Baldrate, Brian C.	12.8		-	Prepare for settlement discussions; participate in settlement conference; meet and confer with J. Millian, C. Brennan, and J. Caughey and discuss case status and strategy; confer with M. Dumville and discuss deposition scheduling; confer with M. Sklaire and discuss deposition of S. Huber; receive and review objections to discovery requests.
9/14/2010	15524	Baldrate, Brian C.	11		-	Confer with J. Millian and C. Brennan re: responding to motion to compel; review and edit draft response; prepare for deposition of M. Denny; confer with C. Herrin re: electronic data issues; receive and review correspondence from SunTrust re: production issues and C. Overby deposition; review electronic data discovery issues.
9/15/2010	15524	Baldrate, Brian C.	12		-	Prepare for and defend deposition of M. Denny; receive and review documents for S. Huber; confer with K. Busick re: deposition scheduling; receive and review deposition of P. Mangelsdorf.
9/16/2010	15524	Baldrate, Brian C.	4.5		-	Prepare for deposition of S. Huber; review objections to United Guaranty's affirmative discovery and develop case strategy.
9/17/2010	15524	Baldrate, Brian C.	10		-	Prepare for and take deposition of Susan Huber; confer with C. Brennan and J. Caughey re: case strategy; review SunTrust's response to discovery obligations; confer with UG and N. Bronni re: 30(b)(6) depositions; confer with J. Cohn and J. Caughey re: sanctions reply.
9/17/2010	15524	Baldrate, Brian C.	0	0.5	287.50	Spoliation: Confer with J. Cohn and J. Caughey re: sanctions reply.
9/18/2010	15524	Baldrate, Brian C.	7		-	Conference with J. Millian, C. Brennan, and J. Caughey re: case strategy, DU issue, deposition scheduling, and sanctions motion; confer with J. Caughey re: claw back issues and deposition preparation; review documents; review and decide on claw back documents; confer with C. Brennan re: case strategy and taking of depositions; draft and send correspondence to J. Whitt; prepare for deposition of J. Gaines and S. Ivey
9/20/2010	15524	Baldrate, Brian C.	0	3	1,725.00	Spoliation: Receive and review SunTrust's opposition; confer with C. Brennan and J. Millian re: case strategy.
9/20/2010	15524	Baldrate, Brian C.	16		-	Travel to Greensboro; meet and confer with W. Durette; confer with J. Gaines and conduct deposition preparation; review SunTrust discovery objections; confer with C. Brennan re: ESI response; receive and review SunTrust's opposition; confer with C. Brennan and J. Millian re: case strategy.
9/21/2010	15524	Baldrate, Brian C.	14		-	Conduct deposition preparation of S. Ivey; review and revise deposition outline; prepare for deposition of A. Atkins; correspond with W. Durette re: deposition of J. Gaines; confer with J. Millian and C. Brennan re: case strategy; confer with KPMG re: ESI data; confer with J. Caughey re: sanctions; begin research and begin drafting Reply brief.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
9/21/2010	15524	Baldrate, Brian C.	0	4	2,300.00	Spoliation: Confer with J. Caughey re: sanctions; begin research and begin drafting Reply brief.
9/22/2010	15524	Baldrate, Brian C.	16.5		-	Confer with J. Millian, C. Brennan, and J. Caughey and discuss case strategy, deposition results, and upcoming plan; manage discovery issues and correspond with SunTrust re: 30(b)(6) deposition; confer with J. Caughey and P. Gavin re: ESI issues and case strategy; continue working on Reply brief and conducting case research; correspond with T. Dupree re: same.
9/22/2010	15524	Baldrate, Brian C.	0	4.5	2,587.50	Spoliation: Continue working on Reply brief and conducting case research; correspond with T. Dupree re: same.
9/23/2010	15524	Baldrate, Brian C.	15.3		-	Meet with A. Seisling and prepare to conduct deposition; meet and confer with S. Millar, T. Bailey, and J. Bryant re: same; confer with J. Millian and W. Durette re: deposition results and case strategy; return to Washington, D.C.; review and revise Reply brief; confer with J. Caughey and N. Bronni re: additional research.
9/23/2010	15524	Baldrate, Brian C.	0	3.5	2,012.50	Review and revise Reply brief; confer with J. Caughey and N. Bronni re: additional research.
9/24/2010	15524	Baldrate, Brian C.	0	8	4,600.00	confer with J. Caughey, T. Dupree, and J. Conn; review and revise sanctions brief and circulate draft.
9/24/2010	15524	Baldrate, Brian C.	11.8		-	Confer with J. Millian re: case strategy, deposition progress, and 30(b)(6) issues; correspond with SunTrust re: depositions; confer with S. Millar re: same; confer with J. Caughey, T. Dupree, and J. Conn; review and revise sanctions brief and circulate draft.
9/25/2010	15524	Baldrate, Brian C.	7.5	7.5	4,312.50	Review and revise sanctions reply; confer with T. Dupree re: sanctions reply brief; confer with R. Maestro, J. Millian, and B. Wegner re: case strategy; confer with J. Caughey re: same.
9/26/2010	15524	Baldrate, Brian C.	4.6		-	Confer with J. Millian re: case strategy; confer with C. Brennan and J. Caughey re: discovery issues and deposition and ESI issues; prepare for deposition of R. Smith; correspond with A. Gron; confer with B. Wagner, R. Maestro, and J. Millian re: sanctions strategy.
9/26/2010	15524	Baldrate, Brian C.	0	0.7	431.25	Spoliation: Confer with B. Wagner, R. Maestro, and J. Millian re: sanctions strategy.
9/27/2010	15524	Baldrate, Brian C.	7		-	Confer with T. Sabelewski, S. Millar, and N. Bronni re: 30(b)(6) deposition; discuss case strategy with J. Millian; review expert reports and meet and confer with A. Gron; prepare for deposition of R. Smith; confer with C. Brennan and J. Caughey and discuss ESI issues and deposition schedule.
9/28/2010	15524	Baldrate, Brian C.	12		-	Review documents and prepare for deposition of R. Smith; take deposition of R. Smith and confer with A. Gron re: response to deposition; confer with J. Caughey and C. Brennan and discuss motions for summary judgment, deposition schedules, and productions issues; meet with N. Bronni re: same.
9/29/2010	15524	Baldrate, Brian C.	13.5		-	Meet and confer with M. Flanagan re: case strategy and count II loans; confer with A. Gron and conduct deposition preparation; receive and review deposition transcript of R. Smith; confer with C. Brennan, J. Caughey, and J. Millian re: case strategy, production issues, deposition status, and summary judgment; confer with N. Bronni and N. Adams re: summary judgment issues.
9/30/2010	15524	Baldrate, Brian C.	11		-	Prepare for and attend deposition of A. Gron; confer with J. Caughey and C. Brennan re: ESI issues, production issues, and motion for summary judgment; confer with B. Wegner re: case status and motions for summary judgment.
10/1/2010	15524	Baldrate, Brian C.	10		-	Review and revise Count I summary judgment motion; confer with N. Bronni and discuss expert reports and Daubert motion; confer with C. Brennan and J. Caughey re: case strategy and production issues; confer with J. Millian and C. Brennan and discuss case strategy; confer with W. Durette re: summary judgment motion and deposition transcripts.
10/2/2010	15524	Baldrate, Brian C.	2		-	Review and revise summary judgment motion; analyze transcripts and develop arguments; confer with J. Zelenay and N. Adams re: due process research.
10/3/2010	15524	Baldrate, Brian C.	5.8		-	Confer with C. Brennan and J. Caughey; confer with C. Doussert re: key case documents; confer with B. Wegner and J. Zelenay re: due process research; review and revise draft motion for summary judgment; research and review premium waiver issues and draft motion insert.
10/4/2010	15524	Baldrate, Brian C.	14.5		-	Confer with C. Brennan re: case research and trial timeline; review and revise Count IV summary judgment motion; review, edit, and revise Count I summary judgment motion and file with the court; correspond with J. Millian and C. Brennan and discuss case strategy.
10/5/2010	15524	Baldrate, Brian C.	10.5	10.5	6,037.50	Meet with C. Brennan and discuss case strategy; meet and confer with B. Wegner, R. Mastro, and J. Millian re: sanctions background and case history; attend and participate in hearing; meet and confer with J. Caughey and C. Brennan and attend hearing.
10/6/2010	15524	Baldrate, Brian C.	7		-	Confer with T. Dupree and provide case update; review and revise privilege log issues and correspond with SunTrust re: privilege log; review and analyze SunTrust's motion for summary judgment; correspond with J. Zelenay re: case strategy.
10/7/2010	15524	Baldrate, Brian C.	8.3		-	Analyze SunTrust's motion for summary judgment and begin planning response; confer with N. Bronni re: Daubert motion; confer with K. Funk re: waiver issue and research in responding to motion for summary judgment; confer with C. Brennan and J. Caughey and discuss trial timeline including motions in limine, witness scheduling, and designation of depositions; receive and review subpoena of R. Fortin; confer with J. Millian, C. Brennan, and J. Caughey re: same; confer with J. Caughey and review deposition exhibits in preparation for sanctions hearing; confer with B. Wegner, J. Millian, C. Brennan, and J. Zelenay re: sanctions strategy.



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10/7/2010	15524	Baldrate, Brian C.	0	3.2	1,868.75	Receive and review subpoena of R. Fortin; confer with J. Millian, C. Brennan, and J. Caughey re: same; confer with J. Caughey and review deposition exhibits in preparation for sanctions hearing; confer with B. Wegner, J. Millian, C. Brennan, and J. Zelenay re: sanctions strategy.
10/8/2010	15524	Baldrate, Brian C.	8.3	4	1,108.43	Confer with B. Wegner, R. Mastro, J. Millian, C. Brennan, and J. Caughey re: case strategy and plan for sanctions hearing; confer with J. Zelenay and K. Funk re: case research; review and revise subpoena of R. Fortin; confer with J. Caughey and coordinate service of process; Confer with J. Millian and discuss case strategy and plan for summary judgment motion; review and analyze fact chronology; draft memorandum for a trial continuance and update case calendar.
10/10/2010	15524	Baldrate, Brian C.	0.8		-	Confer with J. Zelenay and J. Caughey re: waiver research and sanctions hearing.
10/11/2010	15524	Baldrate, Brian C.	10	1	57.50	Confer with B. Shill re: sanctions issues; receive and review transcript from Status conference and circulate to team; correspond with J. Millian re: case strategy; Confer with J. Caughey re: discovery issues, claw back, and case research; correspond with J. Millian re: continuance, summary judgment motion, and case strategy; review and revise continuance motion; review key documents and confer with P. Gavin and J. Caughey re: EZ loans; confer with SunTrust re: case timeline; confer with J. Caughey and discuss summary judgment declarations and back-up tape issue re: P. Gavin.
10/12/2010	15524	Baldrate, Brian C.	12.5	4.5	931.50	Confer with R. Mastro, B. Wegner, and J. Caughey re: sanctions preparation and case strategy; review documents and begin developing timeline for hearing; confer with R. Mastro, J. Millian, and B. Wegner re: sanctions strategy and issues related to hearing exhibits and designations; Research and analyze EZ options claims set forth in SunTrust's motion for summary judgment; confer with S. Millar re: declarations and assistance from P. Gavin and J. Bryant; confer with J. Millian re: response to summary judgment motion and case strategy; confer with J. Zelenay and K. Funk re: sanctions waiver research; continue reviewing case documents for summary judgment motion; confer with R. Mastro, J. Millian, and B. Wegner re: production of Pettitt documents; confer with J. Millian re: case strategy; assist J. Caughey in refining responses to statement of undisputed facts.
10/13/2010	15524	Baldrate, Brian C.	11.5	3	450.00	Confer with J. Caughey and FTI re: graphics for sanctions hearing; review, revise, and edit timeline; conduct VTC conference with B. Wegner, J. Zelenay, and J. Caughey re: sanctions hearing; continue developing cross examinations of key witnesses; confer with C. Seltzer re: M. Pettitt's role in the sanctions hearing; Confer with M. Sheppard re: production of M. Pettitt emails; review and edit SunTrust's statement of material facts; confer with J. Caughey re: same; review transcript and errata of R. Hughes; correspond with N. Bronni re: motions in limine; review and research same; confer with K. Funk and J. Zelenay re: waiver research; review waiver research and develop argument for the sanctions motion; confer with J. Millian re: same.
10/14/2010	15524	Baldrate, Brian C.	0	2.7	1,581.25	Confer with R. Mastro, B. Wegner, and J. Millian re: sanctions hearing; review and revise timeline; begin sanctions hearing outlines.
10/14/2010	15524	Baldrate, Brian C.	11.3		-	Draft, edit, and file a motion to expedite; review and edit motions in limine; review and revise opposition motion and statement of facts; confer with J. Caughey and D. Hershman re: declaration and exhibits for same; confer with J. Millian and discuss case strategy; correspond with M. Sheldon re: back-up tapes; Confer with R. Mastro, B. Wegner, and J. Millian re: sanctions hearing; review and revise timeline; begin sanctions hearing outlines.
10/15/2010	15524	Baldrate, Brian C.	0	0.5	287.50	Confer with B. Shill re: R. Fortin deposition; confer with J. Millian re: same.
10/15/2010	15524	Baldrate, Brian C.	10.5		-	Confer with J. Caughey re: UG's subpoenas and review contract; review and revise motions in limine; confer with J. Millian re: case strategy; receive and review SunTrust's motion to strike and oppositions to UG's two summary judgment motions; confer with M. Flanagan re: Count II loan issues; edit, finalize, and file opposition to SunTrust's motion to dismiss; confer with J. Zellany re: case research and outlining reply brief; confer with N. Bronni re: reply brief on premiums; Confer with B. Shill re: R. Fortin deposition; confer with J. Millian re: same.
10/16/2010	15524	Baldrate, Brian C.	2.8	2.8	1,581.25	Correspond with team re: sanctions strategy; confer with J. Caughey and review documents re: R. Fortin deposition; edit and review deposition designations.
10/17/2010	15524	Baldrate, Brian C.	4.8	4	1,916.67	Correspond with R. Mastro re: sanctions hearing issues; review and designate depositions; confer with J. Caughey re: research issues including stipulations; draft and circulate stipulations; confer with C. Dusseault re: Clack deposition; Review SunTrust's opposition to UG' summary judgment motion; confer with J. Zelenay re: legal argument; confer with M. Flanagan re: discovery responses; confer with J. Caughey re: opposition to motion to strike.
10/18/2010	15524	Baldrate, Brian C.	8		-	Confer with N. Bronni re: motions in limine and J. Caughey re: response to motion to strike; review and finalize motions in limine and edit motion to strike; continue researching and outlining summary judgment reply; confer with M. Denny re: deposition transcript; Confer with R. Mastro re: Dumville deposition and additional exhibit cross references; receive and review additional documents.
10/18/2010	15524	Baldrate, Brian C.	0	3.5	2,012.50	Confer with R. Mastro re: Dumville deposition and additional exhibit cross references; receive and review additional documents.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
10/19/2010	15524	Baldrate, Brian C.	12.3		-	Confer with M. Flanagan re: Count II discovery issues; confer with C. Brennan and J. Caughey and discuss case status; review and edit reply brief on future premiums and circulate draft; receive and review SunTrust's motions in limine of A. Gron and develop response plan; Review and revise stipulations; confer with R. Maestro, B. Wegner, C. Brennan, and C. Dusseault re: sanctions hearing; review additional SunTrust production; confer with sanctions team re: deposition of R. Fortin and discuss case strategy; begin drafting additional continuance of sanctions hearing.
10/19/2010	15524	Baldrate, Brian C.	0	4	2,300.00	Review and revise stipulations; confer with R. Maestro, B. Wegner, C. Brennan, and C. Dusseault re: sanctions hearing; review additional SunTrust production; confer with sanctions team re: deposition of R. Fortin and discuss case strategy; begin drafting additional continuance of sanctions hearing.
10/20/2010	15524	Baldrate, Brian C.	11.5	3	450.00	Draft and revise motion for expedited discovery and sanctions hearing continuance; confer with M. Sheldon re: document update; confer with R. Maestro, B. Wegner, and Sanctions team re: case strategy; review and revise memorandum and circulate draft; Review and revise Reply brief; confer with J. Millian, C. Brennan, and J. Caughey re: brief; correspond with S. Millar re: production of ESI; review SunTrust's motion in limine and confer with N. Bronni re: same.
10/21/2010	15524	Baldrate, Brian C.	0	2.5	1,437.50	Confer with R. Mastro and sanctions team re: Sanctions Hearing strategy; receive and review data from M. Shelton re: new production of documents; edit, revise, finalize file, and serve expedited motion for limited discovery; confer with S. Medeiros and B. Hall re: same; confer with J. Zellenay, C. Brennan, and J. Caughey re: sanctions hearing outlines and begin work.
10/21/2010	15524	Baldrate, Brian C.	8.3		-	Review and revise Count IV Reply brief and Count I Reply brief; confer with J. Millian, C. Brennan, and J. Caughey and discuss case strategy; edit finalize and submit Reply briefs; Confer with R. Mastro and sanctions team re: Sanctions Hearing strategy; receive and review data from M. Shelton re: new production of documents; edit, revise, finalize file, and serve expedited motion for limited discovery; confer with S. Medeiros and B. Hall re: same; confer with J. Zellenay, C. Brennan, and J. Caughey re: sanctions hearing outlines and begin work.
10/22/2010	15524	Baldrate, Brian C.	5.5		-	Correspond with M. Shelton re ESI data; confer with S. Millar, C. Brennan, and J. Caughey re: same; confer with M. Flanagan re: Count II discovery issues; review and analyze SunTrust's Reply to MSJ and SunTrust's Motion in Limine; confer with J. Zelenay and N. Bronni re: same and discuss strategy going forward; Develop strategy and assignment of labor in developing cross-examinations; confer with J. Caughey and discuss central teams; confer with J. Zelenay and discuss cross examination outlines; review key testimony and begin drafting outlines; confer with sanctions team on motion for expedited review.
10/22/2010	15524	Baldrate, Brian C.	0	2	1,150.00	Develop strategy and assignment of labor in developing cross-examinations; confer with J. Caughey and discuss central teams; confer with J. Zelenay and discuss cross examination outlines; review key testimony and begin drafting outlines; confer with sanctions team on motion for expedited review.
10/25/2010	15524	Baldrate, Brian C.	10.5		-	Confer with C. Brennan re: case strategy and key timelines; correspond with M. Sheldon re: production issues; review documents and prepare responses to motions in limine; review SunTrust reply brief to motion for summary judgment; Confer with J. Caughey re: sanctions outlines, confer with J. Zelenay re: draft outlines; review and edit deposition of J. Gold; review and revise new stipulation; attend status conference with court and discuss sanctions issues; receive and review additional sanctions documents produced by SunTrust; review and revise outlines in preparation of sanctions hearing; confer with J. Millian, C. Brennan, and J. Caughey and discuss case strategy.
10/26/2010	15524	Baldrate, Brian C.	12.5		-	Confer with N. Bronni on motions in limine; meet and confer with M. Flanagan, C. Brennan, and J. Caughey and discuss ESI; confer with J. Millian and discuss case strategy; receive and review deposition errata; correspond with M. Sheldon re: production issues; Review, revise, and edit stipulation; confer with R. Maestro and J. Millian re: additional stipulations from SunTrust's recent productions; confer with J. Zelenay and B. Wegner re: outlines of R. Fortin and J. Gold; confer with FTI re: technology issues and courthouse logistics; receive preliminary outline.
10/26/2010	15524	Baldrate, Brian C.	0	10.5	6,037.50	Review, revise, and edit stipulation; confer with R. Maestro and J. Millian re: additional stipulations from SunTrust's recent productions; confer with J. Zelenay and B. Wegner re: outlines of R. Fortin and J. Gold; confer with FTI re: technology issues and courthouse logistics; receive preliminary outline.
10/27/2010	15524	Baldrate, Brian C.	15	15	8,625.00	Receive and review draft outline of S. Thurman; review deposition transcripts and key documents; draft, revise, and edit outline of S. Thurman and confer with J. Caughey re: same; confer with R. Maestro re: stipulation; confer with J. Zelenay, C. Brennan, and J. Caughey re: case strategy and continue trial preparations.
10/28/2010	15524	Baldrate, Brian C.	10.1	8.7	4,333.85	Revise and refine outline of S. Thurman; correspond with R. Maestro re: same; review and revise deposition of J. Gold; confer with B. Wegner and J. Zelenay re: outlines; confer with J. Caughey re: sanctions strategy and research; confer with FTI re: courtroom setup; review recent deposition transcripts of M. Garbowski, S. Thurman, and R. Fortin and incorporate into outline; Confer with A. Seisling re: errata; confer with N. Bronni re: hearing research; review and analyze research and correspond with J. Millian re: same.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
10/29/2010	15524	Baldrate, Brian C.	10.5	10.5	6,037.50	Continue preparation for sanctions hearing including: confer with R. Maestro re: Thurman outline; confer with J. Caughey and C. Brennan re: exhibit binder; review, edit, and supervise development of exhibit binder; confer with J. Millian and C. Brennan re: outline of D. Hovatter; review and edit outline of S. Thurman; review presentation from FTI; coordinate with FTI to upload outline; confer with McGuire Woods re: sanctions exhibit; confer with chambers re: same.
10/30/2010	15524	Baldrate, Brian C.	14	14	8,050.00	Continue preparations for sanctions hearing: confer with sanctions team re: case strategy; review and revise FTI slideshow; review, revise, and discuss outlines and case strategy; correspond with S. Medeiros re: key case documents; prepare for and file sanctions motion on public record; review and modify outline of S. Thurman; coordinate examinations of S. Thurman, J. Gold, R. Fortin, and J. Clack; confer with sanctions team and discuss case strategy.
10/31/2010	15524	Baldrate, Brian C.	8.8	8.8	5,031.25	Continue Sanction Hearing preparation; revise examination of S. Thurman and D. Hovatter; confer with J. Zelenay and B. Wegner to revise examination of J. Gold and R. Fortin; discuss case strategy with J. Millian, R. Mastro, and Sanctions team; confer with SunTrust re: filing Reply Brief on the public record.
11/1/2010	15524	Baldrate, Brian C.	16.5	16.5	9,487.50	Prepare for hearing including finalization of S. Thurman examinations; attend and participate in hearing; discuss case strategy with team; prepare for day two of the hearing, revise and prepare R. Fortin and J. Gold outlines.
11/2/2010	15524	Baldrate, Brian C.	15.5	15.5	8,912.50	Continue preparation for sanctions hearing; revise D. Hovatter examination; attend and participate in sanctions hearing; confer with sanctions team and discuss case strategy; continue preparation for sanctions hearing; prepare closing arguments.
11/3/2010	15524	Baldrate, Brian C.	12.3	12.3	7,043.75	Continue preparation of sanctions hearing; review and revise closing; review proposed SunTrust exhibits and designate opposing exhibits and testimony; create additional United Guaranty exhibits; attend and participate in sanctions hearing; confer with team and discuss case strategy on post-hearing briefs.
11/4/2010	15524	Baldrate, Brian C.	3.3		-	Confer with S. Millard and provide case update on Gavin ESI; confer with M. Flanagan and provide update and discuss Count II; review documents and prepare for Count II meeting; confer with J. Caughey re: Count II; confer with A. Gron re: errata; receive and review deposition of M. Garbowski.
11/4/2010	15524	Baldrate, Brian C.	0.8	0.8	431.25	Gather documents and conduct initial preparations re: Sanctions Hearing post-trial brief; confer with J. Caughey re: same.
11/5/2010	15524	Baldrate, Brian C.	3.8		-	Confer with M. Flanagan, J. Caughey, and C. Brennan re: Count II progress; review errata issues; review M. Denny deposition and responses to interrogatories; receive and review post-trial order and develop plan; confer with J. Caughey, J. Zelenay, and C. Brennan re: same; receive and review day one transcript.
11/5/2010	15524	Baldrate, Brian C.	0	0.7	431.25	Receive and review post-trial order and develop plan; confer with J. Caughey, J. Zelenay, and C. Brennan re: same; receive and review day one transcript.
11/8/2010	15524	Baldrate, Brian C.	5	3.5	1,408.75	Confer with Sanctions team re: case strategy; develop post-trial brief arguments; receive and review sanctions hearing transcripts; confer with Sanctions team and Chambers on trial date and status update; review Count II spreadsheets and continue Count II discovery; confer with S. Millard and provide case update.
11/9/2010	15524	Baldrate, Brian C.	9.8	7.2	3,062.76	Draft sanctions outline; confer with Sanctions team and discuss case strategy; review documents related to adverse inferences and burden shifting; conduct research re: same; receive updates on Count II discovery; discuss responses to production of documents and interrogatory requests; confer with C. Brennan and J. Caughey re: scheduling order based on new trial date; confer with M. Flanagan re: Count II strategy.
11/10/2010	15524	Baldrate, Brian C.	11	10	5,227.27	Begin drafting post-hearing brief; Review and edit draft interrogatory responses; confer with J. Caughey and C. Brennan re: pretrial order and schedule.
11/11/2010	15524	Baldrate, Brian C.	9.3	8.7	4,706.65	Continue drafting post-hearing brief; focus on fraud on the Court; Confer with M. Flanagan, C. Brennan, and J. Caughey re: Count II loans; review interrogatory responses; review and revise scheduling order.
11/12/2010	15524	Baldrate, Brian C.	9.5	9.5	5,462.50	Continue drafting post-hearing sanctions brief focused on alternate remedies; research adverse inferences and issue preclusion; edit and revise brief; receive and review day three transcript and incorporate into draft; confer with C. Brennan and J. Zelenay and discuss brief strategy and research; review second brief concerning fraud on the court; confer with C. Brennan and J. Caughey re: same.
11/13/2010	15524	Baldrate, Brian C.	1.5	1.5	862.50	Confer with C. Brennan and J. Caughey re: editing of post-hearing brief focused on day three transcript and alternative sanctions.
11/14/2010	15524	Baldrate, Brian C.	4.3	4.3	2,443.75	Edit and finalize first draft of first post-hearing brief one; review, edit, and finalize preliminary draft of post-hearing brief two; confer with J. Caughey, J. Zelenay, and C. Brennan re: same.
11/15/2010	15524	Baldrate, Brian C.	7	7	4,025.00	Review, edit, and circulate draft post-hearing briefs; confer with J. Millian, C. Brennan, and J. Caughey and discuss case strategy; confer with R. Mastro re: briefs.
11/16/2010	15524	Baldrate, Brian C.	2	1.5	646.88	Continue review and revision of post-hearing briefs and updating case law; Confer with M. Flanagan on Count II progress; receive and review Count II documents from J. Caughey and discovery responses.
11/17/2010	15524	Baldrate, Brian C.	3.8	3	1,361.84	Confer with J. Millian re: post-hearing briefs and incorporate feedback; review and revise briefs to include input; confer with J. Caughey, C. Brennan, and J. Zelenay re: follow-on research tasks; Confer with J. Caughey and C. Brennan re: Count II discovery and drafting responses; confer with S. Millard re: same.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
11/18/2010	15524	Baldrate, Brian C.	6	6	3,450.00	Review and revise post-sanctions brief.
11/19/2010	15524	Baldrate, Brian C.	9	8.5	4,615.97	Confer with J. Millian and J. Caghey re: post-hearing briefs; review, revise, and edit briefs; correspond with W. Durrette and B. Wegner re: same; Confer with J. Caghey on Count II discovery responses.
11/21/2010	15524	Baldrate, Brian C.	0.8	0.8	431.25	Receive and review feedback from C. Dusseault and sanctions team; confer with C. Brennan and J. Caghey re: same.
11/22/2010	15524	Baldrate, Brian C.	8	8	4,600.00	Review, revise, finalize, and file post-hearing sanctions briefs; review, edit, and finalize exhibits; receive and review SunTrust's post-hearing briefs.
11/23/2010	15524	Baldrate, Brian C.	3.3	2.7	1,293.75	Review and analyze SunTrust's post-trial briefs; confer with C. Brennan, J. Caghey, and J. Zelenay and develop reply strategy and outline response argument; Confer with J. Caghey and C. Brennan on Count II issues and review correspondence.
11/28/2010	15524	Baldrate, Brian C.	0.3	0.3	143.75	Develop reply briefs; confer with J. Zelenay re: progress and plan for same; confer with B. Wegner and J. Millian re: case strategy.
11/29/2010	15524	Baldrate, Brian C.	4.3	4.3	2,443.75	Analyze SunTrust briefs and develop strategy and outline in responding to briefs; confer with C. Brennan and J. Caghey re: same.
11/30/2010	15524	Baldrate, Brian C.	3.5	3	1,478.57	Review and revise post-hearing briefs and circulate to team; confer with J. Caghey, C. Brennan, and J. Zelenay re: same; Prepare for, and participate in, status update with C. Brennan and B. Hall.
12/1/2010	15524	Baldrate, Brian C.	10		-	Confer with J. Millian re: case strategy; confer with J. Caghey and C. Brennan re: Count II; review and edit alternative sanctions brief.
12/1/2010	15524	Baldrate, Brian C.	0	9.5	5,462.50	Spoliation: Review and edit alternative sanctions brief.
12/2/2010	15524	Baldrate, Brian C.	8.5	8.5	4,887.50	Review, finalize, and circulate draft of alternative sanctions brief; correspond with C. Brennan and J. Caghey re: same; continue editing fraud brief and prepare for filing; confer with J. Millian re: case strategy.
12/3/2010	15524	Baldrate, Brian C.	8	8	4,600.00	Review, finalize, and file post hearing response briefs; receive and review SunTrust's post-hearing briefs.
12/6/2010	15524	Baldrate, Brian C.	12.5	6.5	1,943.50	Prepare outline of responses in preparation for hearing on sanctions briefing; confer with J. Millian, B. Wegner, C. Brennan, and J. Caghey and discuss strategy regarding same; prepare for Summary Judgment and Sanctions hearing arguments, including travel to Richmond; meet and confer with B. Wegner, J. Millian, C. Brennan, and J. Caghey; discuss case strategy and arguments; compile key materials and draft response outlines.
12/7/2010	15524	Baldrate, Brian C.	17		-	Prepare for summary judgment motions and draft talking points outline for opposition motion to SunTrust's motion as well as review and revise talking points to our motion; attend and participate in summary judgment motion hearing; confer with B. Wegner, J. Millian, C. Brennan, and J. Caghey and discuss case strategy and preparation going forward; prepare for case and discuss strategy for oral arguments on sanctions motion hearings.
12/7/2010	15524	Baldrate, Brian C.	0	2	1,150.00	Spoliation: Prepare for case and discuss strategy for oral arguments on sanctions motion hearings.
12/8/2010	15524	Baldrate, Brian C.	0.5		-	Confer with C. Brennan regarding case strategy; confer with J. Millian, C. Brennan, and J. Caghey regarding hearing update.
12/13/2010	15524	Baldrate, Brian C.	3.3		-	Read and review NIA objections to subpoena; confer with C. Brennan re: case strategy and planning; confer with J. Brennan re: proof analysis; develop plan for settlement conference.
12/14/2010	15524	Baldrate, Brian C.	3.5		-	Confer with J. Caghey, C. Brennan, and J. Millian re: settlement issues and documents; confer with J. Caghey re case preparation and strategy and trial preparation; review day 1 court transcript from summary judgment hearing.
12/15/2010	15524	Baldrate, Brian C.	1.5		-	Review case file; confer with J. Caghey re: mediation; review day 2 transcript.
12/16/2010	15524	Baldrate, Brian C.	3	3	1,725.00	Finish review of sanctions transcript; receive and review new sanctions briefing order from court; review and outline argument; confer with J. Caghey, C. Brennan, and J. Millian re: same.
12/17/2010	15524	Baldrate, Brian C.	3.8		-	Confer with C. Brennan, J. Caghey, and D. Chiang re: responsive motion; discuss strategy and outline in developing filing; review ESI data; confer with C. Brennan, J. Caghey, and C. Herin re: ESI issues; confer with J. Caghey re: contract attorney issues; confer with chambers re: Count II; correspond with M. Flanagan and J. Millian re: same.
12/20/2010	15524	Baldrate, Brian C.	2.8		-	Confer with J. Brennan and J. Caghey re: case strategy, including Count II loans and responding to motion re: SunTrust counsel; confer with M. Flanagan re: Count II.
12/21/2010	15524	Baldrate, Brian C.	6.3	1	570.44	Review and revise draft motion, memorandum, and order re: Count II discovery; confer with J. Millian and J. Caghey re: same; review outline and confer with J. Caghey and D. Chiang re: motion concerning SunTrust's counsel; confer with J. Caghey and D. Chiang re: contract attorneys; confer with B. Wegner, C. Brennan, and team re: mock jury strategy and case planning and coordination.
12/22/2010	15524	Baldrate, Brian C.	1.3		-	Review draft outline and confer with D. Chiang re: counsel motion.
12/23/2010	15524	Baldrate, Brian C.	1.5	1	575.00	Confer with D. Chiang and J. Caghey re: draft filing re: SunTrust's counsel; confer with SunTrust re: ESI issue; assess and make recommendations on contract attorney teams.
12/28/2010	15524	Baldrate, Brian C.	0.8		-	Confer with D. Chiang re: draft brief; correspond with C. Brennan re: case strategy.
12/29/2010	15524	Baldrate, Brian C.	0.8		-	Confer with C. Brennan and J. Caghey re: draft brief; provide preliminary feedback and develop plan to receive outline from D. Chiang.
12/30/2010	15524	Baldrate, Brian C.	3.5	2	1,150.00	Receive draft brief; confer with D. Chiang, C. Brennan, and J. Caghey; review and edit brief; confer with M. Flanagan re: Count II issues; confer with J. Millian re: same.
12/31/2010	15524	Baldrate, Brian C.	2.8	2.8	1,581.25	Review and edit draft brief on SunTrust counsel; confer with D. Chiang and J. Caghey re: same.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
1/3/2011	15524	Baldrate, Brian C.	8.8	6.5	3,240.77	Edit draft motion focused on 403 balancing test and importance of J. Gold; participate in ESI call with Reed Smith; confer with C. Brennan and B. Wegner re: Count II; receive and analyze SunTrust's opposition to our motion to consolidate.
1/4/2011	15524	Baldrate, Brian C.	5.5		-	Prepare for and participate in case update with B. Hall, B. Wegner, and C. Brennan; review Count II case file; confer with M. Schelsinger re: Count II issues and concerns; correspond with J. Millian re: same; Confer with D. Chiang and J. Caughey re: brief on SunTrust's counsel.
1/4/2011	15524	Baldrate, Brian C.	0	3	2,025.00	Spoilation: Confer with D. Chiang and J. Caughey re: brief on SunTrust's counsel.
1/5/2011	15524	Baldrate, Brian C.	6	5.5	3,403.13	Confer with W. Wegner, C. Dusseault, C. Brennan, and J. Caughey re: brief on SunTrust's counsel; revise and edit brief focused on sanctions and on prejudice due to new counsel; confer with J. Millian re: same; correspond with B. Hall re: brief update; Confer with C. Brennan re: ESI issue; correspond with SunTrust re: same, confer with M. Flanagan re: Count II case strategy; confer with J. Millian re: same; develop Count II strategy.
1/6/2011	15524	Baldrate, Brian C.	5.6	3.7	1,672.43	Review, edit, and analyze brief on SunTrust's counsel; correspond with team re: same; Review Count II files and begin case development.
1/7/2011	15524	Baldrate, Brian C.	5.8	3.2	1,210.34	Analyze and finalize brief on SunTrust's counsel; Analyze and edit reconsolidation reply from D. Chiang; confer with J. Caughey and C. Brennan and develop plan; confer with C. Brennan and S. Millar re: ESI plan re: P. Gavin.
4/3/2011	15524	Baldrate, Brian C.	0	1	675.00	Confer with team re: sanctions renewal motion issues and graphics and discuss case strategy; develop evidence re: negotiated flow plans; review SunTrust's Opposition and begin outlining argument.
12/11/2009	14063	Brennan, Christyne K	12.3	3	1,762.80	Continue to draft and revise motion to dismiss and motion for more definite statement; confer with B. Baldrate and J. Caughey regarding same; draft electronic correspondence to J. Millian, B. Baldrate and J. Caughey regarding SunTrust file from United Guaranty; draft electronic correspondence to S. Medeiros regarding emails referenced in SunTrust's amended complaint; review February 2008 email from SunTrust; confer with J. Millian regarding same; conference calls with KPMG regarding same; electronic correspondence with KPMG regarding same; conference call with J. Millian, P. Gavin and S. Millard regarding same; confer with B. Baldrate regarding status and case management; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding draft motion to dismiss and motion for more definite statement; draft electronic correspondence to W. Durette regarding same; conference call with J. Gaines regarding policies and counterclaim; draft electronic correspondence to J. Millian regarding same.
12/14/2009	14063	Brennan, Christyne K	15.8	0.5	294.07	Continue to revise motion to dismiss; confer with B. Baldrate and J. Millian regarding same; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding same; review draft counterclaim; prepare exhibits for motion to dismiss; prepare exhibits for counterclaim; conference call with B. Keyes and B. Baldrate regarding liability pools and policies; electronic correspondence with T. Sabalewski regarding February 2008 email; electronic correspondence with S. Millard regarding policy documents and motion to dismiss; draft electronic correspondence to C. Manchester regarding additional policy declaration and endorsement pages; revise counterclaim; confer with J. Caughey and B. Baldrate regarding same; finalize motion to dismiss for filing; file same electronically; file counterclaim electronically.
12/17/2009	14063	Brennan, Christyne K	4.8	4.8	2,802.50	Medeiros, B. Hall, W. Durette, J. Millian and B. Baldrate regarding same; conference calls with W. Durette, J. Millian and B. Baldrate regarding same and strategy; conference call with S. Millard regarding same and supplemental interrogatory answers; confer with B. Baldrate regarding same; research for motion concerning February 2008 email; conference calls with review draft KPMG declaration in support of motion for emergency relief; revise same;
12/18/2009	14063	Brennan, Christyne K	7.5	7	4,130.00	
12/20/2009	14063	Brennan, Christyne K	0.5	0.2	118.00	Electronic correspondence with B. Baldrate and J. Caughey regarding opposition to motion to compel and motion for emergency relief.
12/21/2009	14063	Brennan, Christyne K	12.5	8	4,720.00	memorandum in support of motion for temporary restraining order and emergency relief; revise same; confer with B. Baldrate regarding same; draft electronic correspondence to J. Millian regarding same; finalize correspondence to T. Sabalewski regarding supplemental initial disclosures; revise and finalize correspondence to T. Sabalewski regarding supplemental interrogatory answers; electronic correspondence with S. Millard regarding same; conference call with S. Millard regarding same; draft electronic correspondence to T. Sabalewski regarding
12/22/2009	14063	Brennan, Christyne K	9.5	7	4,130.00	Electronic correspondence with W. Durette regarding motion for temporary restraining order and preliminary injunction; confer with B. Baldrate regarding same and standards for preservation of evidence; draft electronic correspondence with T. Keegan regarding revised declaration; confer with J. Caughey regarding Fourth Circuit caselaw concerning preliminary injunction test; revise memorandum in support of motion for emergency relief, motion and order; confer with B. Baldrate and J. Millian regarding same; review hard copy documents for production to SunTrust; confer with B. Baldrate regarding same.
12/23/2009	14063	Brennan, Christyne K	1.3	0.5	283.65	regarding motion for emergency relief, motion to compel and document production.
12/26/2009	14063	Brennan, Christyne K	0.3	0.3	147.50	Conference call with J. Millian, B. Baldrate and KPMG regarding SunTrust production of documents and February 22 email.
12/28/2009	14063	Brennan, Christyne K	14.3	14.3	8,407.50	in Amended Complaint; conference calls with T. Choe regarding same and revised declaration;

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12/29/2009	14063	Brennan, Christyne K	16.3	16.3	9,587.50	Continue to draft and revise motion to file unredacted version of motion for emergency relief papers; finalize same for electronic filing; finalize motion for emergency relief papers for electronic filing; draft electronic correspondence to B. Akremaregarding same and motion to file unredacted version; file same electronically; confer with J. Millian and B. Arkema regarding same and calls to Chambers and Reed Smith; various electronic correspondence with KPMG and J. Caughey regarding search terms, potential imaging of hard drive and February 22 email native files; attend hearing with J. Millian regarding motion for emergency relief and motion to compel; conference call with J. Millian and S. Medeiros regarding same; travel to and from Richmond.
12/30/2009	14063	Brennan, Christyne K	7.3	0.5	292.98	log; electronic correspondence with B. Baldrate regarding same; draft electronic correspondence to J. Millian regarding status and SunTrust's privilege log; review electronic correspondence from T. Sabalewski and J. Millian regarding motion for emergency relief and Pettitt's hard drive; draft electronic correspondence to S. Millard and C. Herrin regarding claims
1/4/2010	14063	Brennan, Christyne K	8.3	0.3	172.50	Continue to review hard copy documents for production to SunTrust; confer with J. Caughey regarding production; conference call with S. Millard, L. Ertell and C. Herrin regarding production of claims files; conference calls with S. Millard regarding hearing on motion for emergency relief and electronic document review; draft electronic correspondence to J. Millian regarding electronic document review; conference calls with J. Hooper regarding same; conference call with J. Millian regarding same; conference call with A. Chan regarding training of contract attorneys and review database; draft electronic correspondence to A. Chan regarding electronic production format and specifications; review revised search term report; draft electronic correspondence to S. Millard regarding document review; conference call with B. Baldrate regarding status and case management.
1/5/2010	14063	Brennan, Christyne K	11.3	2	1,150.00	correspondence to Reed Smith regarding same; conference call with T. Choe regarding Discovery Radar training for contract attorneys; review electronic correspondence from T. Sabalewski regarding Pettitt computer; draft electronic correspondence to KPMG regarding same; draft electronic correspondence to S. Millard regarding same; electronic correspondence with KPMG regarding search terms and privilege filters; electronic correspondence with J.
1/6/2010	14063	Brennan, Christyne K	15.8	2	1,150.00	Review and revise litigation summary and who's who list for electronic document review by contract attorneys; draft electronic document review guidelines and procedures and finalize same; confer with J. Caughey regarding same and case overview briefing to contract attorneys; electronic correspondence with KPMG regarding document review tags, search terms, contract attorney registration in database, document review folders, and search for certain documents related to February 22 email; conference call with KPMG regarding claims files, contract attorney training and electronic document review; electronic correspondence with J. Hooper regarding electronic document review and paralegal assistance; attend contract attorney briefing and training; confer with J. Millian and B. Baldrate regarding status and case management; confer with J. Millian, B. Baldrate and J. Caughey regarding documents related to February 22 email and for production to SunTrust.
1/7/2010	14063	Brennan, Christyne K	0.8	0.8	460.00	Conference call with P. Gavin regarding documents referred to in February 22 email and deposition scheduling; draft electronic correspondence to J. Millian regarding same; electronic correspondence with J. Millian regarding correspondence with Reed Smith regarding Pettitt computer.
1/11/2010	14063	Brennan, Christyne K	9.8	2	1,150.00	Confer with J. Caughey regarding status, electronic document review and claims files production; conference call with S. Millard regarding same; electronic correspondence with KPMG regarding electronic document production, additional contract attorneys and cleared contract attorneys; confer with B. Baldrate and J. Caughey regarding status of electronic document review and privilege log; conference calls with A. Chan, B. Baldrate and J. Caughey regarding electronic document review; case management; review and revise agreed procedures to search Pettitt's hard drive images; confer with J. Millian, B. Baldrate and J. Caughey regarding same.
1/12/2010	14063	Brennan, Christyne K	14.3	0.5	287.50	Conference call with S. Millard regarding status conference concerning February 22 email and status of electronic document review; draft electronic correspondence to KPMG regarding registration of contract attorneys for reviewing documents in electronic database; electronic correspondence with B. Baldrate regarding webshare database and rescission letters; conference call with L. Ertell regarding journal notes on webshare database; conference calls with KPMG regarding electronic document review; confer with A. Lesch and B. Baldrate regarding same; conference call with J. Millian, B. Baldrate, A. Lesch, and KPMG regarding status of uploading documents for review; review and revise privilege log related to hard copy document production; review privileged documents for same; confer with B. Baldrate and J. Caughey regarding same and production of previously withheld hard copy documents; finalize privilege log; draft correspondence to C. Manchester regarding same; electronic correspondence with K. Amborn, N. Adams and M. Healy regarding electronic document review.

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1/14/2010	14063	Brennan, Christyne K	9.3	0.4	230.00	Confer with B. Baldrate regarding case management issues; conference call with S. Millard regarding status of electronic document review; draft electronic correspondence to S. Millard regarding February 22 email correspondence; electronic correspondence with S. Millard and L. Ertell regarding 602 notes; confer with contract attorneys regarding electronic document review; confer with A. Lesch regarding document review and production issues; review draft productivity report; electronic correspondence with KPMG, V. Bratcher and A. Lesch regarding document review issues; conference calls with V. Bratcher and A. Lesch regarding review productivity report and KPMG database issues; electronic correspondence with N. Raspa, K. Amborn, N. Adams, M. Healy and R. Bull regarding privilege review; conference calls with N. Raspa, K. Amborn, N. Adams, M. Healy and R. Bull regarding same; electronic correspondence with contract attorney agency regarding space and review issues; conference calls with J. Hooper regarding same.
1/21/2010	14063	Brennan, Christyne K	7.8	5	2,875.00	Review SunTrust's motion for enlargement of time to complete production of documents related to February 22 email; conference calls with J. Millian regarding same; conference call with W. Durette regarding same; conference call with T. Sabalewski regarding same; electronic correspondence with S. Medeiros regarding same; electronic correspondence with T. Sabalewski and C. Manchester regarding same; electronic correspondence with J. Millian regarding same; confer with B. Baldrate regarding casemanagement issues; confer with B. Baldrate and J. Caughey regarding document review issues, batching of privilege documents and redaction of certain documents; conference call with V. Bratcher, A. Lesch, B. Baldrate and J. Caughey regarding KPMG database, production issues and same.
1/22/2010	14063	Brennan, Christyne K	7.3	6	3,450.00	February 22 email; prepare chronology of communications with Reed Smith regarding same; Review revised opposition to SunTrust's motion for enlargement of time; file same electronically; confer with B. Baldrate regarding case management issues; review productivity reports and electronic correspondence regarding status of document review; conference call with V. Bratcher and B. Baldrate regarding document review; review electronic correspondence from A. Lesch regarding document production issues; draft electronic correspondence to V. Bratcher regarding reallocation of documents for review and productivity report; conference call with T. Keegan, V. Bratcher and B. Baldrate regarding additional data; review documents withheld from production for privilege; draft electronic correspondence to A. Lesch regarding same; confer with J. Millian and B. Baldrate regarding SunTrust's motion for enlargement of time; conference call with J. Millian, B. Baldrate, C. Manchester and T. Sabalewski regarding SunTrust's motion for enlargement of time and deposition of M. Pettitt; confer with J. Caughey and B. Baldrate regarding potentially nonresponsive and privileged documents; further conference calls with V. Bratcher regarding document review and allocation of documents to complete review.
1/25/2010	14063	Brennan, Christyne K	7.3	3	1,725.00	Confer with J. Caughey regarding status of document review; review documents withheld from production for privilege; draft electronic correspondence to A. Lesch regarding same; conference call with Court, J. Millian, B. Baldrate, W. Durette, C. Manchester and T. Sabalewski regarding SunTrust's motion for enlargement of time; confer with J. Millian and B. Baldrate regarding preparation for deposition of M. Pettitt; confer with A. Lesch regarding document production issues and Suntrust's supplemental production of documents; review electronic correspondence from V. Bratcher and J. Caughey regarding document review issues; conference call with A. Lesch regarding metadata associated with documents related to February 22 email; draft electronic correspondence to J. Millian regarding same; review and revise draft production response to SunTrust; draft electronic correspondence to B. Baldrate regarding same; confer with B. Baldrate regarding same; draft electronic correspondence to S. Millard regarding AS/400 data; review productivity reports; review first collection of hot documents; draft electronic correspondence to A. Lesch regarding same; conference call with V. Bratcher, B. Baldrate and J. Caughey regarding completion of document review, production issues and review of SunTrust data; confer with B. Baldrate and J. Caughey regarding electronic document privilege log and coding of SunTrust data.
1/27/2010	14063	Brennan, Christyne K	8.3	2	1,150.00	Continue to review hot documents; draft electronic correspondence to A. Lesch regarding same; electronic correspondence with S. Millard regarding AS/400 information; review metadata regarding documents related to February 22 email; prepare summary of same; electronic correspondence with J. Millian regarding same; conference call with A. Venkatesh regarding AS/400 data; conference call with B. Lentz regarding same; conference call with S. Hill regarding same; confer with B. Baldrate regarding same and status of production; electronic correspondence with A. Lesch regarding production of AS/400; draft electronic correspondence to T. Sabalewski regarding identification of SunTrust counsel to whom Pettitt sent a copy of the February 22 email; review electronic correspondence from S. Hill regarding lender program codes; draft electronic correspondence to B. Baldrate and J. Caughey regarding same; draft electronic correspondence to R. Bull, K. Amborn, M. Healy, N. Adams and N. Raspa regarding privilege review; draft electronic correspondence to V. Bratcher regarding same; confer with A. Lesch regarding production issues; confer with J. Millian and B. Baldrate regarding review of SunTrust documents, spoliation memo and deposition of M. Pettitt; confer with B. Baldrate and J. Caughey regarding privilege review and subpoena duces tecum; conference calls with V. Bratcher regarding privilege review; conference call with K. Amborn regarding same.
1/28/2010	14063	Brennan, Christyne K	7	3	1,725.00	

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1/29/2010	14063	Brennan, Christyne K	8.8	6	3,450.00	Review and revise supplemental and amended responses to SunTrust's document requests; confer with B. Baldrate regarding same; prepare binders of documents related to spoliation issue; conference calls with V. Bratcher regarding privilege review and review of SunTrust production; confer with J. Caughey regarding same and subpoena of M. Pettitt; review subpoena; confer with B. Baldrate regarding same; conference call with W. Durrette regarding same and deposition of M. Pettitt; confer with J. Millian regarding deposition of M. Pettitt and binders of documents related to spoliation issue; revise collection of documents in binders.
2/1/2010	14063	Brennan, Christyne K	2.3	2.3	1,322.50	SP: Conference call with V. Bratcher, B. Baldrate and A. Lesch regarding metadata associated with February 22 related emails; draft electronic correspondence to V. Bratcher and A. Lesch regarding same; revise subpoena to M. Pettitt; conference with B. Baldrate regarding same; confer with J. Millian and B. Baldrate regarding same; draft electronic correspondence to V. Bratcher regarding Pettitt hard drive imaging procedures.
2/2/2010	14063	Brennan, Christyne K	1.8	1.8	1,035.00	SP: Electronic correspondence with V. Bratcher regarding metadata for February 22 related documents; conference call with V. Bratcher regarding same; draft electronic correspondence to J. Millian regarding metadata for February 22 related documents; electronic correspondence with V. Bratcher regarding searches to be run by KPMG of Pettitt's documents; draft electronic correspondence to V. Bratcher regarding SunTrust's supplemental production of February 22 related documents.
2/3/2010	14063	Brennan, Christyne K	2.3	2.3	1,322.50	correspondence with W. Durrette regarding SunTrust's production of February 22 related documents; electronic correspondence with V. Bratcher regarding same; review SunTrust's response to motion for emergency relief; review electronic correspondence from J. Millian and W. Durrette regarding same.
2/4/2010	14063	Brennan, Christyne K	1.8	1.8	1,035.00	SP: Review metadata related to February 22 email native files; conference call with KPMG, V. Bratcher and B. Baldrate regarding same; electronic correspondence with T. Keegan regarding same; draft electronic correspondence to J. Millian regarding February 22 related documents.
2/9/2010	14063	Brennan, Christyne K	9.3	9.3	5,347.50	SP: Review and identify documents for use in M. Pettitt deposition regarding Pettitt's central role within SunTrust and as the primary relationship person with United Guaranty, evidencing the importance of the altered February 22 email to the central issues in the litigation and evidencing Pettitt's knowledge of an ongoing dispute between SunTrust and United Guaranty at the time M. Pettitt altered the February 22 email; confer with J. Caughey regarding same; review various electronic correspondence from C. Setzer, J. Millian and W. Durrette regarding deposition of M. Pettitt; electronic correspondence with T. Keegan regarding metadata related to February 22 emails; review Pettitt's motion for a protective order or to quash subpoena; reviserresponse to Pettitt's motion for a protective order or to quash subpoena; draft electronic correspondence to B. Baldrate regarding same; review research regarding Fifth Amendment privilege does not excuse attendance at a deposition.
2/10/2010	14063	Brennan, Christyne K	6.3	6.3	3,622.50	SP: Review indices of potential February 22 email related deposition documents; conference call with B. Baldrate and J. Caughey regarding same, SunTrust's privilege log, response to Pettitt motion to quash, February 22 privilege log and Pettitt deposition documents; review and revise revised response to Pettitt motion to quash; file same electronically; draft electronic correspondence to T. Keegan regarding February 22 metadata; research privilege waiver issues; draft electronic correspondence to J. Caughey regarding same; review summary of metadata related to February 22 emails from KPMG; electronic correspondence with T. Keegan regarding same; draft electronic correspondence with J. Millian regarding same; draft electronic correspondence to J. Millian regarding status of documents for Pettitt deposition.
2/11/2010	14063	Brennan, Christyne K	7.3	7.3	4,197.50	SP: Review and organize potential exhibits for M. Pettitt deposition; confer with J. Millian, B. Baldrate and J. Caughey regarding same; electronic correspondence with W. Durrette regarding court reporter; finalize copies of exhibits for M. Pettitt deposition; draft electronic correspondence to C. Seltzer regarding same; electronic correspondence with T. Sabalewski regarding clawback of February 22 related document; review SunTrust documents related to two other altered emails; confer with J. Millian, B. Baldrate and J. Caughey regarding same.
2/12/2010	14063	Brennan, Christyne K	0.5	0.5	287.50	SP: Review transcript of M. Pettitt deposition.
2/15/2010	14063	Brennan, Christyne K	5.3	5.3	3,047.50	SP: Confer with B. Baldrate and N. Adams regarding privilege waiver research; review documents for use as potential exhibits for J. Clack and S. Thurman depositions; prepare copies of deposition exhibits for J. Clack and S. Thurman depositions; draft electronic correspondence to J. Millian and W. Durrette regarding same; revise potential exhibit list; draft electronic correspondence to J. Millian regarding same.
2/16/2010	14063	Brennan, Christyne K	4.8	4.8	2,760.00	SP: Review SunTrust's motion regarding privilege issues and submission of documents for in camera review; confer with N. Adams and B. Baldrate regarding drafting response to same; conference calls with A. Lesch and J. Caughey regarding February 2006 altered email and search for same in SunTrust's documents; confer with B. Baldrate and J. Caughey regarding same; draft electronic correspondence to J. Millian regarding same.



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2/17/2010	14063	Brennan, Christyne K	2.8	2.8	1,610.00	SP: Review correspondence from SunTrust regarding redacted altered documents; draft electronic correspondence to W. Durette regarding same; review redacted altered documents; confer with B. Baldrate and J. Caughey regarding same; draft electronic correspondence to J. Millian regarding same; confer with B. Baldrate and J. Caughey regarding spoliation timeline.
2/18/2010	14063	Brennan, Christyne K	7.8	7.8	4,485.00	SP: Review draft response to SunTrust's motion for protective order; confer with B. Baldrate regarding same; review deposition transcripts of J. Clack and S. Thurman; draft introduction and background facts for response to SunTrust's motion for protective order and response to the Court's February 11 order; electronic correspondence with S. Millard regarding deposition of P. Gavin; conference call to P. Gavin regarding same.
2/19/2010	14063	Brennan, Christyne K	16.3	16.3	9,372.50	SP: Draft electronic correspondence to S. Millard regarding deposition transcripts of Pettitt, Clack and Thurman; conference call with court reporter regarding original transcripts; draft electronic correspondence to J. Millian regarding same; electronic correspondence with court reporter regarding deposition exhibits; continue to draft introduction and background facts for response to SunTrust's motion for protective order and response to the Court's February 11 order; revise draft response; confer with B. Baldrate regarding same and revisions to same; confer with J. Millian regarding same; confer with J. Caughey regarding timeline of spoliation issue, motion to compel and response to SunTrust's motion for protective order; confer with N. Adams regarding organization of cases cited in response to SunTrust's motion for protective order.
2/20/2010	14063	Brennan, Christyne K	0.5		-	Draft electronic correspondence to S. Millard regarding insurance policies at issue in litigation; electronic correspondence with V. Bratcher regarding additional SunTrust production of documents for KPMG; review KPMG productivity report regarding contract attorney review of SunTrust production.
2/20/2010	14063	Brennan, Christyne K	2	2	1,150.00	SP: Continue to revise draft response to SunTrust's motion for protective order and response to the Court's February 11 order; confer with B. Baldrate regarding same.
2/22/2010	14063	Brennan, Christyne K	12.3	12.3	7,072.50	SP: Revise motion to compel; draft electronic correspondence to B. Baldrate regarding same; draft proposed order; electronic correspondence with J. Millian regarding response to SunTrust's motion for protective order and response to the Court's February 11 order, motion to compel and proposed order; review and response to SunTrust's motion for protective order and response to the Court's February 11 order; prepare exhibits for same; confer with J. Caughey regarding same; confer with N. Adams regarding review of legal argument in response; electronic correspondence with A. Wilkins regarding cite check; finalize response, motion, proposed order and exhibits for filing; conference call with J. Millian and B. Baldrate regarding redaction of same; redact response and exhibits; file same electronically; draft electronic correspondence to M. Dumville regarding filing of unredacted copy of response and exhibits.
2/23/2010	14063	Brennan, Christyne K	1.8	1.8	1,035.00	SP: File unredacted copy of response to the Court's February 11 order and exhibits electronically; conference call with court clerk regarding same; conference call with Judge Payne's law clerk regarding same; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding United Guaranty's motion to compel and response to the Court's February 11 order; confer with J. Caughey regarding timing for filing briefs regarding motion to compel; draft electronic correspondence to J. Millian regarding same; confer with N. Adams and B. Baldrate regarding spoliation research.
2/24/2010	14063	Brennan, Christyne K	0.8	0.8	460.00	SP: Conference call with P. Gavin regarding deposition; draft electronic correspondence to J. Millian regarding same; confer with B. Baldrate regarding talking points for call with court regarding privilege briefing and motion to compel.
2/25/2010	14063	Brennan, Christyne K	0.8	0.8	460.00	correspondence from SunTrust regarding privilege log and documents submitted to court for in camera review; confer with J. Caughey regarding metadata for altered emails.
3/2/2010	14063	Brennan, Christyne K	3.7	3.7	2,127.50	SP: Draft electronic correspondence to Reed Smith regarding hearing dates for motion to compel; conference call to P. Gavin regarding deposition; draft electronic correspondence to S. Millard and P. Gavin regarding same; review memorandum regarding spoliation; review SunTrust's reply to privilege briefing and description of documents submitted for in camera review; confer with B. Baldrate regarding same; confer with J. Millian and B. Baldrate regarding same and deposition of P. Gavin; draft electronic correspondence to M. Dumville regarding deposition of P. Gavin and hearing on motion to compel; draft electronic correspondence to E. Kobrick, S. Medeiros, B. Hall and S. Millard regarding SunTrust's reply.
3/3/2010	14063	Brennan, Christyne K	1.2	1.2	690.00	SP: Electronic correspondence with W. Durette and B. Baldrate regarding hearing on motion to compel; confer with J. Millian and B. Baldrate regarding same; conference call with W. Durette regarding same; draft electronic correspondence to M. Dumville regarding same; confer with J. Caughey regarding SunTrust's revised February 22 privilege log and electronic correspondence to J. Millian regarding same; draft electronic correspondence to J. Millian regarding timing of motion for sanctions.
3/4/2010	14063	Brennan, Christyne K	1.5	1.5	862.50	SP: Conference call with court regarding hearing on motion to compel; draft electronic correspondence to M. Dumville regarding same; draft electronic correspondence to J. Millian regarding same; confer with J. Caughey regarding metadata related to altered emails and potential additional depositions and discovery requests related to altered emails; confer with J. Millian, B. Baldrate, N. Adams and J. Caughey regarding spoliation memorandum.

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3/5/2010	14063	Brennan, Christyne K	0.5	0.5	287.50	SP: Draft electronic correspondence to J. Millian regarding hearing on motion to compel; confer with J. Millian regarding same; conference call to L. Wagner regarding same; conference call with B. Baldrate and N. Adams regarding spoliation memorandum.
3/8/2010	14063	Brennan, Christyne K	1.2	1.2	690.00	SP: Conference call with P. Gavin regarding subpoena; draft electronic correspondence to P. Gavin regarding same; draft electronic correspondence to J. Millian regarding same; conference call with E. Kobrick, S. Medeiros, J. Millian and B. Baldrate regarding motion for sanctions.
3/9/2010	14063	Brennan, Christyne K	0.8	0.8	460.00	SP: Conference call with P. Gavin regarding documents requested by subpoena; confer with B. Baldrate regarding same; draft electronic correspondence to J. Millian regarding same; draft electronic correspondence to E. Kobrick, S. Medeiros, B. Hall and S. Millard regarding SunTrust's opposition to motion to compel.
3/10/2010	14063	Brennan, Christyne K	6.7	6.7	3,852.50	subpoena; confer with J. Millian and B. Baldrate regarding deposition of P. Gavin and documents for same; review outline for sanctions motion; confer with N. Adams and B. Baldrate
3/11/2010	14063	Brennan, Christyne K	2.7	1	575.00	Pettitt documents; revise correspondence to M. Dumville regarding objections to subpoena of P. Gavin; draft electronic correspondence to B. Baldrate regarding same; electronic
3/12/2010	14063	Brennan, Christyne K	4.2	4.2	2,415.00	metadata associated with redacted documents; draft electronic correspondence to A. Lesch and
3/14/2010	14063	Brennan, Christyne K	7.5	7.5	4,312.50	SP: Continue to review and revise spoliation memorandum; confer with B. Baldrate regarding same; prepare outline for reply in support of motion to compel the production of SunTrust documents withheld as privileged; confer with B. Baldrate regarding same; draft reply.
3/15/2010	14063	Brennan, Christyne K	11.7	2	1,150.00	Continue to draft reply; confer with B. Baldrate regarding same; review documents related to SunTrust's December 2003 combo enhancement request and February 2004 request related to EZ Options in support of motion to compel; confer with J. Caghey regarding same; conference calls with J. Millian regarding same; conference call with J. Millian and P. Gavin regarding documents referred to in February 2008 email; review P. Gavin deposition transcript; mark-up same for P. Gavin review; draft electronic correspondence to J. Millian regarding same; revise reply.
3/16/2010	14063	Brennan, Christyne K	13.5	13.5	7,762.50	Continue to draft and revise reply in support of motion to compel; confer with B. Baldrate regarding same; confer with J. Caghey regarding review of United Guaranty's document for those relied upon by P. Gavin in preparation of the February 22 email; conference call with J. Millian, S. Millard and P. Gavin regarding P. Gavin deposition testimony and correspondence to Reed Smith regarding same; confer with J. Caghey regarding SunTrust's privilege logs; conferences with J. Millian and B. Baldrate regarding reply in support of motion to compel; continue to revise same.
3/17/2010	14063	Brennan, Christyne K	15.7	15.7	9,027.50	SP: Continue to draft and revise reply in support of motion to compel; confer with B. Baldrate and J. Millian regarding same; review and revise exhibits to reply requesting the production of specific documents and addressing documents submitted to the court for in camera review; confer with J. Caghey regarding SunTrust's privilege logs for same; finalize reply and exhibits; file same electronically; draft electronic correspondence to W. Durette regarding courtesy copies of same for court; review specific cases in draft spoliation memo; confer with B. Baldrate and J. Millian regarding same.
3/18/2010	14063	Brennan, Christyne K	3.7	3.7	2,127.50	Confer with J. Caghey regarding 2004 Huber emails produced to SunTrust; review same; conference call with P. Gavin regarding correspondence to Reed Smith regarding documents referred to in February 22 email; electronic correspondence with J. Millian regarding same; electronic correspondence with P. Gavin regarding same; conference call with J. Millian regarding same.
3/19/2010	14063	Brennan, Christyne K	4.7	4.7	2,702.50	Draft electronic correspondence to S. Medeiros regarding reply to motion to compel; search and review United Guaranty and SunTrust productions related to February 22 email; review P. Gavin deposition transcript in conjunction with same; confer with J. Caghey regarding same; conference call with J. Millian regarding same; review and revise correspondence to M. Dumville regarding same; electronic correspondence with J. Millian regarding same.
3/22/2010	14063	Brennan, Christyne K	3.5	2	1,150.00	Confer with J. Caghey regarding review of United Guaranty and SunTrust productions related to combo enhancement requests; confer with B. Baldrate regarding status; draft electronic correspondence to S. Millard and P. Gavin regarding correspondence to Reed Smith regarding Gavin deposition; revise case calendar; draft electronic correspondence to J. Millian, B. Baldrate and J. Caghey regarding same; review correspondence from SunTrust regarding electronic production and documents related to Gavin deposition; confer with B. Baldrate and J. Caghey regarding same and case action items.
4/20/2010	14063	Brennan, Christyne K	7.8	7.8	4,485.00	Review correspondence from SunTrust regarding supplemental production of documents related to altered emails; conference call with J. Millian regarding same; conference call with B. Hall, J. Millian and B. Baldrate regarding status; confer with J. Caghey regarding organization of SunTrust's productions related to altered emails, status of contract attorney review and KPMG search term and production issues; review SunTrust's productions for documents identified in Appendix B of motion to compel; conference call with J. Caghey regarding same; review SunTrust's April 13 production of documents related to altered emails; review draft memorandum regarding C. Goodwin; draft electronic correspondence to J. Millian regarding same.

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4/21/2010	14063	Brennan, Christyne K	5	4	2,300.00	Confer with B. Baldrate regarding KPMG issues and status; confer with J. Caughey regarding same, SunTrust's production of documents related to altered emails, identification of documents from Appendix B to motion to compel that have not yet been produced, research regarding SunTrust's clawback of documents based on banking regulation; research regarding redactions in responsive documents and discussion with B. Borden regarding same; continue to review SunTrust's April 13 production of documents related to altered emails; draft summary of certain emails; draft electronic correspondence to J. Millian regarding same; confer with J. Caughey regarding discussion with L. Noonan regarding banking regulation and limitations on protection of SunTrust's documents under same.
4/30/2010	14063	Brennan, Christyne K	6	2	1,150.00	Continue to revise correspondence to SunTrust regarding SunTrust's proposed search terms, responsiveness review of documents and objections to SunTrust's documents requests; confer with B. Baldrate regarding same; confer with J. Caughey regarding same; review KPMG hit report for SunTrust's revised proposed search terms; conference call with J. Caughey regarding same; review electronic correspondence from J. Caughey and KPMG regarding same; draft electronic correspondence to B. Hall regarding SunTrust documents related to fake emails; review SunTrust's supplemental production of privileged documents; electronic correspondence with K. Guillermo regarding same; draft electronic correspondence to T. Sabalewski regarding same; confer with J. Millian and B. Baldrate regarding correspondence to SunTrust regarding SunTrust's revised proposed search terms and status; confer with J. Caughey and B. Baldrate regarding documents responsive to SunTrust's proposed search terms related to SunTrust key employees; review electronic correspondence from KPMG regarding revised hit report for SunTrust's revised proposed search terms.
5/6/2010	14063	Brennan, Christyne K	6	2	1,150.00	Review updated summary of claims denied for lack of DU approval from W. Phifer; update master chronology with SunTrust documents from fake email production; confer with J. Caughey regarding SunTrust production issues; electronic correspondence with S. Millard regarding nonsearchable documents and KPMG; review draft correspondence to SunTrust regarding supplemental production of documents responding to certain of SunTrust proposed search terms; conference call with L. Noonan and J. Caughey regarding suspicious activity reports and misstatements on loan applications; confer with B. Baldrate and J. Caughey regarding status.
5/11/2010	14063	Brennan, Christyne K	7.3	6	3,450.00	Conference call with A. Beschloss and V. Bratcher regarding nonsearchable documents; conference call with S. Millard, KPMG, V. Bratcher and J. Caughey regarding same; conference call with B. Hall, J. Millian and B. Baldrate regarding status; confer with J. Millian and B. Baldrate regarding same and document productions; confer with J. Caughey regarding SunTrust's supplemental document production; conference call with J. Millian regarding SunTrust privilege log related to fake email production; review documents in fake email production related to draft Pettitt affidavit; draft electronic correspondence to J. Millian regarding same; review draft correspondence to M. Dumville regarding fake email production; draft electronic correspondence to J. Millian regarding same; search for transmittal of genuine version of February 1, 2006 email by SunTrust to Reed Smith; confer with J. Caughey and B. Baldrate regarding same; confer with K. Guillermo and J. Caughey regarding same; confer with J. Millian and B. Baldrate regarding same and sanctions motion.
5/12/2010	14063	Brennan, Christyne K	4.8	1	575.00	B. Baldrate and J. Caughey regarding same; confer with B. Baldrate and J. Caughey regarding same and key documents identified in SunTrust's fake email production; review summary of
5/14/2010	14063	Brennan, Christyne K	4.8	2	1,150.00	Review and revise litigation summary; electronic correspondence with S. Millard regarding same; conference call with P. Gavin and B. Baldrate regarding matrices and EZ loans; confer with B. Baldrate regarding same; review matrices and United Guaranty documents regarding same; confer with J. Caughey regarding SunTrust clawed back documents and organization of key documents referenced in fake email production; review electronic correspondence from T. Choe and K. Guillermo regarding SunTrust's supplemental document production and SunTrust clawed back documents; review electronic correspondence from K. Guillermo regarding organization of SunTrust's loan files and United Guaranty's claims files; review KPMG status report of action items; confer with J. Caughey regarding same.
5/19/2010	14063	Brennan, Christyne K	9.3	3	1,725.00	with J. Millian regarding same; confer with B. Baldrate regarding same; continue to review chronology of communications between SunTrust and United Guaranty; review documents
5/20/2010	14063	Brennan, Christyne K	3.8	1	575.00	Finalize R. Mastro pro hac application for filing; electronic correspondence with W. Durette regarding same; review W. Durette comments on draft joint submission on scheduling; review J. Millian revisions to same; conference call with J. Millian regarding same; confer with B. Baldrate regarding same; electronic correspondence with W. Durette regarding D. Hovatter deposition; confer with B. Baldrate regarding D. Hovatter deposition exhibits; confer with B. Baldrate and J. Caughey regarding objections to requests for admissions, KPMG issues and supplemental production.
5/21/2010	14063	Brennan, Christyne K	0.8	0.4	230.00	Review correspondence from SunTrust regarding documents related to fake email production; review electronic correspondence from KPMG, J. Caughey and B. Baldrate regarding search for communications between SunTrust and United Guaranty regarding insurance of interest only first EZ loans.

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5/25/2010	14063	Brennan, Christyne K	5.3	2	1,150.00	Conference call with K. Moran regarding D. Hovatter deposition exhibits; electronic correspondence with J. Millian regarding same; electronic correspondence with K. Moran regarding same; draft electronic correspondence to T. Sabalewski regarding encryption code for redacted documents; confer with J. Caughey regarding same; conference call with S. Medeiros, R. Mastro, W. Durette and B. Baldrate regarding scheduling conference; review supplemental production of Thurman notes; confer with B. Baldrate regarding same; review draft objections and responses to requests for admission; review cases and treatises related to same; confer with B. Baldrate and J. Caughey regarding same; confer with J. Caughey regarding status of KPMG issues and contract attorney review; revise notices of deposition for S. Thurman and J. Clack; confer with J. Caughey regarding same.
5/26/2010	14063	Brennan, Christyne K	8.3	6	3,450.00	Thurman's notes; draft electronic correspondence to T. Sabalewski regarding production of Thurman notes; electronic correspondence with R. Mastro regarding same; conference call with
5/27/2010	14063	Brennan, Christyne K	9.8	6	3,450.00	Continue to revise objections and responses to SunTrust's requests for admission; confer with J. Caughey regarding potential deposition exhibits for S. Thurman and J. Clack depositions; review revised subpoena of J. Gold; confer with B. Baldrate regarding same; draft electronic correspondence to T. Sabalewski regarding production of S. Thurman notes; draft electronic correspondence to T. Sabalewski regarding production of documents previously withheld under banking regulation; confer with J. Millian and B. Baldrate regarding subpoena of J. Gold and SunTrust's requests for admission; further revise objections to requests for admission; draft electronic correspondence to J. Millian regarding same; review SunTrust's third amended complaint; draft electronic correspondence to J. Millian, W. Durette and R. Mastro regarding same.
5/28/2010	14063	Brennan, Christyne K	8.3	8.3	4,772.50	conference call with J. Millian regarding same; confer with J. Caughey regarding subpoena for documents to Reed Smith; review correspondence from T. Sabalewski regarding clawback and technical problem documents; draft electronic correspondence to S. Millard regarding policy documents filed with Virginia; review subpoena of documents to M. Dumville; revise same;
6/1/2010	14063	Brennan, Christyne K	0.8	0.4	230.00	Conference call with B. Baldrate regarding S. Thurman deposition exhibits; review electronic correspondence regarding same and objections to requests for admission; draft electronic correspondence to S. Millard regarding contact information for J. Whitt and R. Hughes.
6/2/2010	14063	Brennan, Christyne K	0.5	0.5	287.50	Review electronic correspondence from B. Baldrate and J. Caughey regarding S. Thurman and J. Clack deposition exhibits and call with United Guaranty to discuss SunTrust claims; conference call with J. Caughey regarding same.
6/3/2010	14063	Brennan, Christyne K	3.3	1	575.00	confer with J. Caughey regarding Count II loans, supplemental production and KPMG issues; draft electronic correspondence to B. Baldrate and J. Caughey regarding additional hard copy documents from United Guaranty; draft electronic correspondence to S. Millard regarding
6/9/2010	14063	Brennan, Christyne K	5	1	575.00	Confer with J. Caughey regarding key documents related to spoliation issues; conference call with S. Millard and B. Baldrate regarding Reporting Program Manual; confer with A. Lucas, B. Baldrate and J. Caughey regarding research concerning ripeness of premium payments counterclaim; review draft responses to requests for admission; confer with B. Baldrate regarding same; conference call with M. Avery regarding Reporting Program Manual; conference call with B. Baldrate regarding same.
6/10/2010	14063	Brennan, Christyne K	7.8	2	1,150.00	Draft electronic correspondence to J. Caughey and B. Baldrate regarding review of documents for key date in requests for admission; review electronic correspondence from J. Hanflink regarding SunTrust Project; draft electronic correspondence to J. Caughey regarding same; draft electronic correspondence to K. Moran regarding SunTrust's supplemental production of documents relating to banking regulation; confer with B. Baldrate regarding index of key documents for spoliation binders; review Reed Smith objections to subpoena; review Anderson Kill objections to subpoena; draft electronic correspondence to J. Millian regarding call with Reed Smith to discuss objections to subpoena; conference call with G. French regarding policy documents; draft electronic correspondence to S. Millard regarding list of all SunTrust IOF Combos without DU approval; draft electronic correspondence to J. Caughey regarding review of SunTrust production for Reporting Program Manual; draft electronic correspondence to J. Caughey regarding status of obtain policy documents filed with Virginia Department of Insurance; review SunTrust's answer to counterclaim regarding premium payment issue; draft electronic correspondence to J. Millian regarding same; confer with B. Baldrate regarding same and Count I and II counterclaims; review correspondence from T. Sabalewski regarding clawback; review clawed back document; confer with B. Baldrate and J. Caughey regarding same; conference call with P. Gavin and B. Bald
6/11/2010	14063	Brennan, Christyne K	3.8	3	1,725.00	Confer with A. Lucas, B. Baldrate and J. Caughey regarding anticipatory breach research concerning premium payments counterclaim; confer with B. Baldrate and J. Caughey regarding spoliation documents and revised index; review draft sanctions motion outline; confer with B. Baldrate regarding same and action items; conference call with B. Baldrate regarding correspondence to SunTrust regarding Reporting Program Manual; review transcript of J. Clack deposition.
6/14/2010	14063	Brennan, Christyne K	1.8	5.5	3,162.50	counterclaim and spoliation motion; confer with J. Caughey regarding sampling of

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6/17/2010	14063	Brennan, Christyne K	4.8	4	2,300.00	Electronic correspondence with J. Caughey regarding SunTrust's supplemental productions; confer with B. Baldrate regarding status, motion for sanctions and notices of deposition; revise and finalize notices of deposition; draft electronic correspondence to S. Millard regarding employee interviews; review draft motion for sanctions; confer with J. Caughey and B. Baldrate regarding same; review certain cases cited in same.
6/21/2010	14063	Brennan, Christyne K	7.5	4	2,300.00	Conference calls with J. Caughey regarding clawback documents, potential exhibits for J. Gold deposition, SunTrust's supplemental productions; draft electronic correspondence to J. Hanflink and P. Gavin regarding requalification of Count II loans; electronic correspondence with B. Hall regarding confidentiality agreements with other lenders; confer with B. Baldrate regarding motion for sanctions; review and revise same.
6/22/2010	14063	Brennan, Christyne K	11.5	11.5	6,612.50	Draft and revise motion for sanctions; review cases cited in same; confer with B. Baldrate regarding same; confer with J. Caughey regarding same.
6/23/2010	14063	Brennan, Christyne K	7.8	6	3,450.00	Continue to revise motion for sanctions; electronic correspondence with J. Caughey regarding same; conference call with S. Millard regarding discovery status, experts and deposition preparation; draft action items; confer with B. Baldrate regarding same; review memorandum regarding ripeness of premium payments counterclaim; confer with A. Lucas, B. Baldrate and J. Caughey regarding same; confer with B. Baldrate and J. Caughey regarding J. Gold deposition and exhibits; draft electronic correspondence to T. Sabalewski regarding documents clawed back by SunTrust.
6/24/2010	14063	Brennan, Christyne K	4.8	3	1,725.00	Confer with J. Caughey and B. Baldrate regarding J. Gold production and electronic discovery issues; confer with J. Caughey regarding J. Gold deposition exhibits; electronic correspondence with L. Ertell regarding collection of claims files; electronic correspondence with K. Moran regarding SunTrust's supplemental spoliation production; confer with B. Baldrate and J. Caughey regarding same; electronic correspondence regarding S. Edmonds and M. Pettitt depositions; review correspondence from R. Holzheimer regarding supplemental production of redacted documents; confer with J. Caughey regarding same; conference call with K. Guillermo regarding metadata issues related to United Guaranty production.
6/25/2010	14063	Brennan, Christyne K	4	1	575.00	Draft further electronic correspondence to L. Ertell regarding claims files; electronic correspondence regarding J. Gold deposition; confer with B. Baldrate regarding actions item; conference call with J. Millian, B. Baldrate and J. Caughey regarding J. Gold deposition; conference call with P. Gavin, J. Hanflink and B. Baldrate regarding summary of requalification of Count II loans; conference call to J. Bohrer regarding visit; conference call with B. Baldrate and J. Caughey regarding key documents for meetings with P. Gavin, A. Siesling and K. Corman; conference call with L. Ertell regarding claims files; confer with J. Caughey regarding review of S. Thurman transcript excerpts for J. Gold deposition.
6/26/2010	14063	Brennan, Christyne K	0.3		-	Draft electronic correspondence to K. Guillermo regarding document production and review issues; review electronic correspondence from KPMG and K. Guillermo regarding same.
6/27/2010	14063	Brennan, Christyne K	1.8		-	Review chronology and identify documents for discussion with P. Gavin; draft electronic correspondence to J. Caughey regarding same.
6/28/2010	14063	Brennan, Christyne K	8.8	3	1,725.00	Electronic correspondence with J. Caughey and B. Baldrate regarding destruction of additional documents clawed back by SunTrust; electronic correspondence with L. Ertell regarding claims files; conference call with J. Bohrer regarding interview call; conference call with R. Hughes regarding same; confer with B. Baldrate regarding sanctions motion; draft status update; draft electronic correspondence to J. Millian regarding same; review electronic correspondence from KPMG and K. Guillermo regarding K. Corman documents; review K. Corman documents; prepare documents for meetings with P. Gavin, A. Siesling and K. Corman; revise subpoena of M. Pettitt; revise notice of deposition of M. Pettitt; confer with B. Baldrate regarding same; confer with J. Millian, B. Baldrate and J. Caughey regarding J. Gold deposition.
6/29/2010	14063	Brennan, Christyne K	8.8	6	3,450.00	Conference call with B. Hall, J. Millian and B. Baldrate regarding status; conference call with W. Durette regarding same; confer with P. Gavin and B. Baldrate regarding requalification project, claims, guidelines and deposition preparation; conference call with J. Caughey regarding R. Hughes documents and S. Edmunds deposition exhibits; confer with S. Medeiros and B. Baldrate regarding J. Gold deposition; draft electronic correspondence to S. Medeiros and B. Hall regarding spoliation deposition excerpts; conference call with J. Millian and B. Baldrate regarding status and sanctions motion; travel to and from airport.
6/30/2010	14063	Brennan, Christyne K	11.8	2	1,150.00	Confer with K. Corman and B. Baldrate regarding deposition preparation, risk committee documents and loan product approvals; confer with R. Hughes and B. Baldrate regarding same; conference call with C. Clement regarding C. Stumbo; electronic correspondence with C. Clement regarding same; electronic correspondence with B. Hall regarding same; confer with A. Siesling, P. Gavin, and B. Baldrate regarding claims and guidelines; conference calls with J. Caughey regarding M. Pettitt deposition exhibits and preparation of excerpts from J. Gold deposition; travel to and from airport.
7/1/2010	14063	Brennan, Christyne K	1.5	1	575.00	Revise correspondence to R. Holzheimer responding to document discovery issues; confer with B. Baldrate and J. Caughey regarding same and M. Pettitt deposition exhibits; review SunTrust's second set of requests for admission; draft electronic correspondence to S. Millard regarding same.

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7/2/2010	14063	Brennan, Christyne K	7.8	2	1,150.00	Conference call to C. Clement regarding C. Stumbo; draft electronic correspondence to C. Clement regarding same; electronic correspondence with B. Hall regarding same; conference call with J. Bohrer regarding factual background issues and S. Edmunds; draft electronic correspondence to J. Millian regarding same; conference call with J. Caughey regarding status of KPMG's review of technical issues with United Guaranty's production for response to R. Holzheimer; confer with J. Millian and B. Baldrate regarding discovery, experts and depositions of S. Edmunds and M. Pettitt; draft electronic correspondence to J. Millian regarding key documents from interviews of P. Gavin and A. Seisling; draft correspondence to R. Holzheimer regarding discovery dispute; draft electronic correspondence to R. Holzheimer regarding same.
7/5/2010	14063	Brennan, Christyne K	3.8	3	1,725.00	Confer with J. Caughey regarding S. Edmunds and M. Pettitt deposition exhibits and correspondence with SunTrust regarding electronic document production issues; review draft motion for sanctions; confer with B. Baldrate regarding same and deposition of M. Pettitt; conference call with B. Baldrate and C. Seltzer regarding deposition of M. Pettitt; review SunTrust's privilege log related to SAR documents; draft electronic correspondence to K. Guillermo regarding volume of SunTrust's production of SAR documents; draft electronic correspondence to B. Hall regarding communication with C. Stumbo; draft electronic correspondence to J. Bryant regarding premium refund payments to SunTrust; confer with J. Caughey regarding waiver research in Virginia concerning same, SAR documents, SunTrust's privilege logs and status of supplemental production.
7/6/2010	14063	Brennan, Christyne K	9.5	9.5	5,462.50	Travel to Richmond for S. Edmunds deposition; review potential S. Edmunds deposition exhibits; conference call with B. Hall, W. Durette and B. Baldrate regarding status; attend deposition of S. Edmunds; conference calls with J. Millian to B. Hall and S. Medeiros regarding same; confer with J. Millian and B. Baldrate regarding same.
7/7/2010	14063	Brennan, Christyne K	10.3	10.3	5,922.50	Review electronic correspondence and metadata for doctored email; confer with B. Baldrate regarding same; conference call with J. Caughey regarding same and electronic discovery issues; prepare for call with R. Holzheimer regarding electronic discovery issues; conference call with J. Millian, W. Durette and R. Holzheimer regarding same; attend deposition of M. Pettitt; confer with J. Millian and B. Baldrate regarding same and sanctions motion; conference call with J. Millian and B. Baldrate to S. Medeiros and B. Hall regarding M. Pettitt deposition and doctored email; travel from Richmond.
7/8/2010	14063	Brennan, Christyne K	7.8	3.5	2,012.50	Draft electronic correspondence to L. Ertell regarding supplemental claims files; conference call with L. Ertell regarding same; conference call with J. Millian regarding sanctions motion; conference call with B. Hall regarding discovery issues, sanctions motion and C. Stumbo; draft electronic correspondence to B. Hall regarding contact information for C. Stumbo; conference call with J. Bohrer regarding DU consultant and C. Stumbo; review pretrial order; draft electronic correspondence to J. Millian regarding same; confer with J. Caughey regarding SunTrust's proposed search terms and employees; confer with B. Baldrate and J. Caughey regarding documents incorporated in chronology and status of document review and production; confer with J. Millian, B. Baldrate and J. Caughey regarding same, search strings, doctored email and sanctions motion; review scheduling order transcript regarding Thurman interview notes and motion to compel regarding other altered evidence; draft electronic correspondence to J. Millian regarding same.
7/9/2010	14063	Brennan, Christyne K	4.8	-	-	Review electronic correspondence from S. Millard regarding SunTrust's acceptance of premium payment refunds; draft electronic correspondence to S. Millard regarding same and requests for admission; confer with B. Baldrate regarding searches for additional doctored emails; conference call with J. Caughey and B. Baldrate regarding same; review compiled SunTrust privilege log; confer with B. Baldrate regarding same; electronic correspondence with S. Millard regarding litigation summary; draft electronic correspondence to R. Holzheimer regarding SunTrust's proposed search terms; draft electronic correspondence to J. Caughey regarding same for document review by contract attorneys; draft electronic correspondence to J. Millian regarding DU consultant; review C. Stumbo interview outline; confer with J. Millian and B. Baldrate regarding call to C. Stumbo.
7/11/2010	14063	Brennan, Christyne K	0.3	-	-	Draft electronic correspondence to S. Millard regarding information for responses to SunTrust's second set of requests for admission.
7/12/2010	14063	Brennan, Christyne K	5.5	-	-	Conference calls to C. Stumbo; review electronic correspondence from KPMG and J. Caughey regarding file extension metadata requested by SunTrust; draft electronic correspondence to K. Guillermo and J. Caughey regarding same; draft electronic correspondence to J. Caughey regarding status of KPMG processing of SunTrust employee name search terms; conference call with P. Gavin regarding SunTrust's second set of requests for admission; conference call with S. Millard, L. Ertell, J. Bryant and B. Baldrate regarding same; confer with B. Baldrate regarding action items; confer with B. Baldrate and J. Caughey regarding same and nonsearchable documents; draft electronic correspondence to P. Gavin regarding certain nonsearchable documents; conference call with P. Gavin regarding same; confer with J. Caughey regarding electronic discovery issues and response to SunTrust regarding same.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
7/13/2010	14063	Brennan, Christyne K	9.8		-	Conference call with KPMG, J. Caughey and B. Baldrate regarding electronic document issues; revise correspondence to R. Holzheimer regarding metadata; draft electronic correspondence to R. Holzheimer regarding same; revise correspondence to R. Holzheimer regarding documents identified by SunTrust as containing technical problems; confer with J. Caughey regarding same; review correspondence from T. Choe regarding same; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding Desktop Underwriter expert; conference call with H. Adler regarding same; conference call with M. Hurley regarding same; draft electronic correspondence to P. Gavin regarding certain nonsearchable documents; draft statement of facts; confer with B. Baldrate and J. Caughey regarding same.
7/14/2010	14063	Brennan, Christyne K	11.3	2	1,150.00	Revise objections to second set of requests for admission; confer with B. Baldrate regarding same; draft electronic correspondence to R. Holzheimer regarding SunTrust employee name search terms; revise statement of facts; confer with J. Caughey and B. Baldrate regarding same; conference call with J. Millian regarding electronic discovery issues and hearing with court regarding same; prepare documents for hearing; draft electronic correspondence to S. Millard regarding search locations; electronic correspondence with KPMG regarding SunTrust proposed search terms and shared drives; draft correspondence to R. Holzheimer regarding metadata; review revised statement of facts; confer with B. Baldrate and J. Caughey regarding same.
7/15/2010	14063	Brennan, Christyne K	11.8	6	3,450.00	Continue to revise statement of facts; confer with B. Baldrate and J. Caughey regarding same; draft electronic correspondence to R. Holzheimer regarding metadata; review privilege logs related to suspicious activity report documents; draft correspondence to R. Holzheimer regarding same; review electronic correspondence from J. Millian, R. Mastro and T. Dupree regarding sanctions motion; confer with B. Baldrate regarding same; confer with J. Caughey and B. Baldrate regarding index of exhibits; electronic correspondence with KPMG regarding documents pulled by SunTrust's proposed search terms; review same; draft electronic correspondence to J. Caughey regarding processing of additional SunTrust search terms; conference call with S. Millard regarding requests for admission responses and discovery dispute issues; conference calls with R. Holzheimer regarding discovery dispute issues; confer with J. Millian and B. Baldrate regarding discovery issues and sanctions motion; conference call with J. Caughey regarding doctored emails and metadata.
7/16/2010	14063	Brennan, Christyne K	8.8	4	2,300.00	Confer with B. Baldrate and J. Caughey regarding doctored emails and one page chronology for sanctions motion; conference call with J. Bohrer regarding DU consultant and C. Stumbo; draft electronic correspondence to J. Millian regarding same; conference call with KPMG regarding declaration in support of sanctions motion; draft subpoena of C. Stumbo; electronic correspondence regarding Dallas process server; conference call with W. Durette regarding call with court concerning discovery issues; confer with J. Millian regarding same; conference call with L. Wagner regarding motion for emergency relief transcript; conference call with J. Millian, B. Baldrate, J. Caughey, R. Holzheimer and court regarding discovery issues; confer with J. Millian, B. Baldrate and J. Caughey regarding same, nonsearchable documents and sanctions motion; finalize objections to requests for admission; draft electronic correspondence to M. Dumville, C. Manchester and T. Sabalewski regarding same.
7/19/2010	14063	Brennan, Christyne K	6.5	5	2,875.00	Confer with J. Caughey regarding one page timeline for sanctions motion; revise same; confer with J. Caughey and M. Mansinghani regarding research concerning SunTrust's privilege logs; electronic correspondence with J. Bohrer regarding DU consultant; electronic correspondence with T. Choe regarding KPMG declaration concerning altered emails; draft electronic correspondence to J. Millian regarding deposition transcripts and erratas; conference call with A. Beschloss regarding KPMG declaration concerning altered emails; review subpoena to United Guaranty Corporation; draft electronic correspondence to J. Millian regarding same; confer with J. Caughey regarding revisions to statement of facts for sanctions motion; draft correspondence to R. Holzheimer regarding supplemental production of documents pulled by employee name search terms; confer with J. Caughey regarding index of exhibits for sanctions motion and further analysis of any additional doctored emails; electronic correspondence regarding transcript of call with court regarding discovery issues; confer with J. Caughey regarding further revisions to one page timeline for sanctions motion.
7/20/2010	14063	Brennan, Christyne K	6.8	6	3,450.00	Review draft sanctions motion; confer with J. Caughey regarding same; draft electronic correspondence to J. Millian regarding transcripts; finalize correspondence to R. Holzheimer regarding supplemental production of employee name search terms documents; draft electronic correspondence to R. Holzheimer regarding same; continue to revise one page timeline for sanctions motion; conference call with B. Hall, J. Millian and W. Durette regarding status, sanctions motion and discovery issues; conference call with J. Millian and W. Durette regarding sanctions motion and deposition of M. Dumville; confer with J. Caughey regarding action items and revised statement of facts; conference call with P. Gavin and J. Caughey regarding declaration; confer with M. Mansinghani regarding privilege log research; review correspondence from R. Holzheimer regarding metadata; review electronic correspondence regarding draft sanctions motion.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
7/21/2010	14063	Brennan, Christyne K	5.5	5.5	3,162.50	Review Reed Smith privilege log; draft electronic correspondence to J. Millian regarding same and M. Dumville deposition; electronic correspondence with R. Holzheimer regarding call to discuss resolution of search terms; electronic correspondence with A. Beschloss regarding KPMG declaration; confer with J. Caughey regarding statement of facts and documents for M. Dumville deposition; review correspondence regarding fifth doctored email; conference call with R. Holzheimer regarding search terms; review revised statement of facts; confer with J. Caughey regarding same.
7/22/2010	14063	Brennan, Christyne K	8.8	5	2,875.00	Prepare for meeting with D. Packer regarding Desktop Underwriter; confer with J. Millian regarding same; confer with D. Packer, J. Millian and J. Caughey regarding Desktop Underwriter; conference call with J. Bohrer regarding credit policy expert; draft subpoena and notice of deposition of M. Dumville; draft electronic correspondence to J. Millian regarding same; confer with J. Caughey regarding sixth doctored email; confer with K. Guillermo and J. Caughey regarding search terms for identifying additional doctored emails and analysis of such emails, supplemental claims files, and corrupted SunTrust documents; draft electronic correspondence to K. Guillermo and J. Caughey regarding search terms for identifying additional doctored emails; electronic correspondence with A. Beschloss regarding KPMG declaration; draft electronic correspondence to T. Sabalewski regarding corrupted SunTrust files.
7/23/2010	14063	Brennan, Christyne K	5.5	5.5	3,162.50	Review and revise KPMG declaration; conference call with A. Beschloss, T. Choe and J. Caughey regarding same; review electronic correspondence from J. Bohrer regarding potential DU expert; draft electronic correspondence to J. Millian regarding same; revise subpoena and notice of deposition of M. Dumville; electronic correspondence regarding court reporter and videographer for M. Dumville deposition; review errata of J. Gold deposition; draft electronic correspondence to J. Caughey and B. Baldrate regarding same; draft declaration of P. Gavin for sanctions motion; confer with J. Caughey regarding deposition exhibits for M. Dumville deposition; review of potentially M. Pettitt doctored emails and summary of guidelines transmittals; confer with J. Millian and J. Caughey regarding sixth doctored email; draft electronic correspondence to M. Dumville regarding subpoena and notice of deposition.
7/25/2010	14063	Brennan, Christyne K	0.3		-	Review electronic correspondence from J. Caughey regarding guidelines; draft electronic correspondence to A. Beschloss regarding KPMG declaration.
7/26/2010	14063	Brennan, Christyne K	9.8	6	3,450.00	Review summary of guidelines transmittals; confer with J. Caughey regarding same; continue to draft P. Gavin declaration; conference calls with P. Gavin regarding same; draft electronic correspondence to J. Millian regarding same; confer with J. Caughey regarding additional potentially doctored documents by M. Pettitt; electronic correspondence with KPMG regarding declaration for sanctions motion; conference call with S. Millard regarding status and general policies related to desktop underwriter; conference call with court regarding logistics of sanctions motion filing; review order regarding referral of settlement conference to magistrate judge; review biography of magistrate judge; draft electronic correspondence to J. Millian regarding same; conference call with T. Keegan regarding KPMG declaration; review draft discussion of May 2007 and March 2006 emails for KPMG declaration; confer with J. Caughey regarding same; draft responses to SunTrust's second set of requests for admissions.
7/27/2010	14063	Brennan, Christyne K	11.8	1	575.00	Conference calls with G. French, T. Scott, P. Gavin and B. Poppoly regarding transmission of declaration pages and endorsements to SunTrust; confer with J. Caughey regarding additional doctored document; continue to draft responses to requests for admission; prepare summary of same; draft electronic correspondence to S. Millard regarding information for responses to requests for admission; confer with J. Millian and J. Caughey regarding M. Dumville deposition, counterclaim, experts and sanctions motion; draft electronic correspondence to S. Millard regarding subpoenas to United Guaranty Corporation and United Guaranty Services and relevant shared drives and custodians; electronic correspondence regarding deposition of M. Dumville; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding settlement conference.
7/28/2010	14063	Brennan, Christyne K	7	1	575.00	Draft electronic correspondence to T. Keegan regarding KPMG declaration; confer with B. Baldrate regarding status and action items; electronic correspondence with B. Hall regarding settlement conference; draft motion, memo and agreed order for voluntary dismissal of counts I and II of counterclaim; confer with J. Millian and B. Baldrate regarding same, settlement conference, and UGC and UGS subpoenas; conference call with B. Hall regarding settlement conference and dismissal of counts I and II of counterclaim; conference call with C. Manchester regarding settlement conference; confer with J. Millian regarding same; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding same; draft electronic correspondence to S. Millard regarding SunTrust's Count I loans; draft electronic correspondence to P. Gavin regarding guidelines transmittals.



Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
7/29/2010	14063	Brennan, Christyne K	6.8		-	Review electronic correspondence from T. Keegan regarding KPMG declaration; confer with J. Caughey and B. Baldrate regarding same; conference call with J. Bohrer regarding potential DU experts; draft electronic correspondence to J. Millian regarding same; conference call with J. Caughey regarding search for documents between M. Pettitt and P. Gavin; conference call with C. Galley regarding potential DU expert; confer with J. Caughey regarding review of UGC subpoena to determine whether documents requested are encompassed by search terms; confer with B. Baldrate regarding same and correspondence to SunTrust regarding privilege log; review electronic correspondence from B. Hall regarding appeal response template; draft electronic correspondence to J. Millian regarding same; draft electronic correspondence to P. Gavin regarding change logs; conference call with J. Frankl regarding potential DU expert; confer with J. Caughey regarding KPMG and contract attorney action items; draft objections to SunTrust's second set of document requests; draft second set of document requests to SunTrust.
7/30/2010	14063	Brennan, Christyne K	8.8	8.8	5,060.00	Revise objections to SunTrust's second set of document requests and interrogatories; confer with B. Baldrate regarding same; revise responses to requests for admission; conference call with P. Gavin regarding same; conference call to A. Siesling regarding same; electronic correspondence with S. Millard regarding same; confer with J. Millian and B. Baldrate regarding same; electronic correspondence with J. Frankl regarding DU expert; revise litigation description; electronic correspondence with S. Millard regarding same; finalize responses to requests for admission; draft electronic correspondence to M. Dumville, C. Manchester and T. Sabalewski regarding same.
8/2/2010	14063	Brennan, Christyne K	4.5		-	Review correspondence from T. Sabalewski regarding supplemental production; draft electronic correspondence to K. Guillermo regarding replacement files for SunTrust production; draft electronic correspondence to S. Millard regarding final responses to requests for admission; electronic correspondence with S. Medeiros, B. Hall and S. Millard regarding settlement conference; draft electronic correspondence to J. Frankl regarding CVs of potential DU experts; draft electronic correspondence to L. Ertell regarding archived emails; draft electronic correspondence to J. Millian and W. Durette regarding scheduling settlement conference; electronic correspondence with J. Spinella regarding potential DU experts; draft electronic correspondence to J. Millian regarding same; draft electronic correspondence to C. Manchester regarding settlement conference; research potential DU expert; confer with B. Baldrate and N. Bronni regarding objections to subpoenas; confer with B. Baldrate regarding action items.
8/3/2010	14063	Brennan, Christyne K	10.3	0.5	287.50	Electronic correspondence with J. Spinella regarding potential DU expert meeting; conference call with J. Millian regarding same; conference call with J. Councilman regarding potential DU expert; electronic correspondence with J. Millian regarding same; conference call to R. Seidman regarding same; conference call with K. Guillermo and B. Baldrate regarding analysis of potentially doctored emails; confer with B. Baldrate and N. Bronni regarding objections to United Guaranty Corporation and United Guaranty Services subpoena; confer with J. Millian, B. Baldrate and N. Bronni regarding same; draft electronic correspondence to S. Millard regarding United Guaranty Services role as contract underwriter; revise objections to United Guaranty Corporation subpoena; draft electronic correspondence to T. Sabalewski regarding same.
8/4/2010	14063	Brennan, Christyne K	10.5	1	575.00	Conference call with R. Seidman regarding potential DU expert; conference call with L. Dixon regarding same; conference call to J. Bohrer regarding Fannie contacts; confer with J. Spinella, D. Hershman, J. Millian and B. Baldrate regarding potential DU expert; conference calls with S. Millard regarding same, United Guaranty Services contract underwriting role and SunTrust interest only first loans run through DU; electronic correspondence with S. Millard regarding same; draft electronic correspondence to J. Millian and B. Baldrate regarding SunTrust interest only first loans run through DU; conference call to T. Sabalewski regarding United Guaranty Corporation and United Guaranty Services subpoenas; confer with B. Baldrate regarding metadata for doctored documents; electronic correspondence with K. Guillermo regarding same; conference call with K. Guillermo and B. Baldrate regarding same; prepare background documents and L. Borrelli documents for J. Spinella and J. Hershman; draft electronic correspondence to J. Spinella and J. Hershman regarding same; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding SunTrust's expert reports and potential DU expert; confer with J. Millian and B. Baldrate regarding depositions of SunTrust employees, United Guaranty Services and SunTrust interest only first loans run through DU; draft electronic correspondence to J. Spinella regarding rebuttal experts for SunTrust's Dempsey and Smith expert reports.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
8/6/2010	14063	Brennan, Christyne K	7	5	2,875.00	Conference call with C. Seltzer regarding stipulation concerning Pettitt's invocation of Fifth Amendment regarding additional fake emails; draft same; electronic correspondence with J. Millian regarding same; draft electronic correspondence to R. Mastro regarding same; electronic correspondence with C. Seltzer regarding same; conference call with S. Medeiros, B. Hall and J. Millian regarding sanctions motion and experts; review curriculum vitae of potential rebuttal experts for Dempsey and Smith reports; electronic correspondence with J. Millian regarding same; conference call with N. Bronni regarding response to UGS subpoena; electronic correspondence with P. Gavin regarding declaration for sanctions motion; electronic correspondence with J. Millian regarding same; review electronic correspondence from C. Manchester regarding settlement conference; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding same; draft electronic correspondence to T. Keegan regarding KPMG declaration for sanctions motion; conference call with T. Keegan regarding KPMG declaration; revise response to United Guaranty Services subpoena; electronic correspondence with N. Bronni regarding same.
8/9/2010	14063	Brennan, Christyne K	10.3		-	Electronic correspondence with C. Manchester regarding settlement conference; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding same; draft correspondence to R. Holzheimer regarding supplemental production of documents in response to SunTrust proposed search terms; confer with N. Bronni, J. Caughey and B. Gorman regarding sanctions motion and appendix of exhibits; draft electronic correspondence to T. Choe regarding numbers of documents related to additional SunTrust proposed search terms; confer with J. Caughey regarding same and status of contract attorney review; draft electronic correspondence to J. Spinella and D. Hershman regarding Borrelli back-up materials; conference call with J. Millian, J. Spinella and D. Hershman regarding expert report; electronic correspondence with P. Gavin regarding deposition; conference call with J. Caughey, K. Guillermo and KPMG regarding declaration; confer with N. Bronni and J. Caughey regarding responses to SunTrust's second set of discovery requests; electronic correspondence with M. Dumville regarding call to discuss deposition scheduling; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding depositions; draft electronic correspondence to J. Gaines, C. Light, B. Lentz and K. Busick regarding same; draft electronic correspondence to C. Manchester regarding dismissal of Counts I and II of the counterclaim; draft electronic correspondence to B. Hall regarding stop loss and SunTrust
8/10/2010	14063	Brennan, Christyne K	10.8	4	2,300.00	Conference calls with S. Ivey, R. Hughes, A. Atkins and J. Bohrer regarding deposition availability; conference calls to M. Denny, J. Whitt and B. Lentz regarding same; conference call with B. Hall and W. Durette regarding status, sanctions motion, discovery and experts; prepare summary of deponents' availability; confer with J. Millian, J. Spinella, R. Hershman and M. Flaharty regarding potential rebuttal experts to R. Smith and J. Dempsey expert reports; confer with J. Caughey regarding KPMG declaration, sanctions motion, status of contract attorney review, collection of documents for P. Gavin deposition preparation and discussion with P. Gavin regarding altered matrix; conference call with B. Stein and J. Caughey regarding policies related to DU; electronic correspondence with P. Gavin and S. Medeiros regarding subpoena of P. Gavin; confer with J. Millian regarding deposition scheduling; conference call with J. Millian, W. Durette, M. Dumville, C. Manchester and T. Sabalewski regarding same; conference calls with N. Bronni regarding motion to exceed page limit; draft electronic correspondence to P. Gavin, B. Lentz and C. Light regarding depositions; draft electronic correspondence to J. Spinella and D. Hershman regarding risk committee meeting minutes; revise summary of deposition schedules; draft electronic correspondence to J. Millian regarding same.
8/11/2010	14063	Brennan, Christyne K	8.8	2	1,150.00	Conference call with R. Hughes regarding deposition; draft electronic correspondence to R. Hughes regarding same; draft electronic correspondence to S. Ivey regarding same; conference call with B. Hall, J. Bryant and N. Bronni regarding maximum cumulative liability and premium payment data; draft electronic correspondence to J. Bryant regarding policy numbers for loan pools; electronic correspondence with T. Keegan regarding KPMG declaration; review and revise motion for leave to file memorandum in excess of page limit; electronic correspondence with J. Millian regarding same; confer with J. Caughey regarding same; conference call with J. Millian regarding same; file same electronically; conference call with B. Stein and J. Caughey regarding United Guaranty policies concerning Desktop Underwriter; finalize agreed order to dismiss counts I and II of counterclaim; draft electronic correspondence to T. Sabalewski and W. Durette regarding same; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding motion for leave to file memorandum in excess of page limit; review electronic correspondence from M. Dumville regarding additional doctored document; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding same.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
8/12/2010	14063	Brennan, Christyne K	9.5	0.5	287.50	Finalize motion to voluntarily dismiss counts I and II of counterclaim; file same electronically; draft electronic correspondence to K. Moran regarding courtesy copies of same to J. Payne; draft electronic correspondence to M. Dumville regarding N. Harmon and P. Mangelsdorf depositions; conference call with B. Baldrate regarding deposition scheduling; conference call with D. Hershman and J. Spinella regarding DU expert report; conference call with B. Hall regarding rebuttal to Dempsey report; confer with B. Baldrate and J. Caughey regarding sanctions motion; conference call with J. Millian and B. Baldrate regarding same, depositions and experts; conference calls to R. Coyle and W. Justice regarding deposition availability; conference call with P. Gavin regarding deposition and deposition preparation; conference call with R. Hughes regarding deposition preparation; draft electronic correspondence to J. Spinella and D. Hershman regarding additional examples of SunTrust loans where SunTrust obtained DU approval on the interest only first loan; draft electronic correspondence to C. Manchester regarding exhibit to Dempsey report and loan data; conference call with J. Millian and A. Carron regarding rebuttal to Smith report; conference call with B. Baldrate regarding United Guaranty Services contract documents; draft electronic correspondence to J. Spinella and D. Hershman regarding pleadings; conference call with B. Baldrate and J. Caughey regarding exhibits to sanctions motion; d
8/13/2010	14063	Brennan, Christyne K	8.8		-	Draft deposition calendar; draft electronic correspondence to J. Millian regarding same; conference calls with B. Baldrate regarding KPMG declaration and responses to SunTrust's second set of discovery requests; confer with B. Baldrate regarding same; review SunTrust's response to motion to exceed page limit; conference call with J. Bryant, D. Hamilton and N. Bronni regarding maximum cumulative liability and premium payment data; electronic correspondence with K. Guillermo regarding claims files; review and revise draft responses to SunTrust's second set of discovery requests; review and revise reply to SunTrust's response to motion to exceed page limit; file same electronically.
8/14/2010	14063	Brennan, Christyne K	0.5		-	Conference call with A. Gron regarding Smith report; review same regarding loss reserves; draft electronic correspondence to J. Millian regarding same.
8/16/2010	14063	Brennan, Christyne K	10.8		-	Continue to review and revise responses to SunTrust's second set of document requests; electronic correspondence with J. Caughey regarding supplemental production of documents; review correspondence to R. Holzheimer regarding same; confer with B. Baldrate and J. Caughey regarding same; confer with J. Millian and B. Baldrate regarding status of sanctions motion and P. Gavin declaration; conference call with P. Gavin, S. Millard, J. Millian, B. Baldrate and J. Caughey regarding deposition preparation; conference call with R. Hughes and J. Millian regarding same; confer with J. Millian regarding status of expert reports and deposition schedule; conference call with J. Spinella regarding status of D. Hershman report and M. Flaharty discussion of stop loss limits and loan pools; confer with J. Millian and B. Baldrate regarding responses to Suntrust's second set of discovery requests; revise responses to second set of interrogatories; confer with B. Baldrate and N. Bronni regarding same; finalize responses to second set of document requests; draft electronic correspondence to M. Dumville, C. Manchester and T. Sabalewski regarding same.
8/17/2010	14063	Brennan, Christyne K	10.5		-	Confer with D. Hershman and J. Spinella regarding DU expert report; conference call with D. Hershman and P. Gavin regarding same; conference call with M. Flaharty and J. Spinella regarding Dempsey rebuttal report; conference call with J. Bryant regarding revised maximum cumulative liability data; confer with J. Caughey regarding documents for P. Gavin deposition preparation; conference call with D. Hershman and R. Hughes regarding DU expert report; draft electronic correspondence to J. Spinella and D. Hershman regarding guidelines; conference call with J. Millian, J. Bryant, R. McLane and D. Hamilton regarding loan pools, liability limits and premiums; confer with J. Millian regarding deposition scheduling and experts; conference call with J. Spinella regarding status of D. Hershman and M. Flaharty expert reports; revise deposition calendar; draft electronic correspondence to J. Millian regarding same; draft expert report review schedule; draft electronic correspondence to J. Millian regarding same.
8/18/2010	14063	Brennan, Christyne K	9		-	Conference call with G. Bessinger regarding DU policies; confer with A. Gron regarding rebuttal to Smith report; conference call with J. Millian, A. Carron and A. Gron regarding same; conference call with B. Hall regarding experts; review M. Flaharty draft report; conference call with M. Flaharty, J. Spinella and W. Shapps regarding same; draft electronic correspondence to D. Lynch regarding Dempsey exhibits; draft electronic correspondence to M. Flaharty, J. Spinella and W. Shapps regarding same; review order regarding motion to exceed page limit; electronic correspondence with J. Millian, T. Dupree and R. Mastro regarding same; conference call with J. Millian, B. Baldrate and J. Caughey regarding P. Gavin deposition preparation and sanctions motion; conference call with B. Baldrate and J. Caughey regarding same; draft electronic correspondence to B. Hall regarding draft expert reports; draft electronic correspondence to M. Dumville regarding depositions.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
8/19/2010	14063	Brennan, Christyne K	13.8	1.5	862.50	Conference call with W. Shapss and R. Hershman regarding M. Flaharty draft report; review same; conference call with J. Spinella, W. Shapss and R. Hershman regarding revisions to same; review A. Gron draft report; conference call with A. Carron and A. Gron regarding same; conference calls with A. Gron regarding report status; review D. Hershman draft report; conference call with J. Millian, D. Hershman and J. Spinella regarding same; confer with J. Caughey regarding sanctions motion and exhibits; conference call with court regarding filing under seal; draft electronic correspondence to S. Millard regarding claims files and maximum cumulative liability data; conference call with R. McLane, W. Shapss and R. Hershman regarding loan pools and stop loss; further conference calls with W. Shapss and R. Hershman regarding M. Flaharty draft report; revise same; draft electronic correspondence to B. Hall regarding A. Gron report; draft expert disclosure; draft electronic correspondence to J. Millian regarding same; confer with J. Millian regarding expert status; finalize sanctions motion for filing.
8/20/2010	14063	Brennan, Christyne K	10.5	0.5	287.50	Confer with J. Caughey regarding finalizing sanctions motions; conference call with S. Millard regarding P. Gavin deposition prep, expert reports, claims files and commutation data; review revised M. Flaharty report; conference call with J. Millian, M. Flaharty, R. Hershman and W. Shapss regarding M. Flaharty report; revise correspondence to R. Holzheimer regarding supplemental production; confer with J. Caughey regarding same; conference call with J. Millian and A. Gron regarding A. Gron report; electronic correspondence regarding N. Harmon deposition; draft notice of deposition; confer with J. Caughey regarding same and C. Light and B. Lentz deposition preparation documents; conference call with J. Millian, D. Hershman and J. Spinella regarding D. Hershman report; finalize expert disclosures and correspondence to M. Dumville regarding same; finalize D. Hershman, A. Gron and M. Flaharty expert reports; draft electronic correspondence to M. Dumville, C. Manchester and T. Sabalewski regarding same; revise correspondence to R. Holzheimer regarding SunTrust's proposed search terms; confer with J. Caughey regarding same; further draft proposed deposition schedule; draft electronic correspondence to J. Millian regarding same.
8/25/2010	14063	Brennan, Christyne K	10.8		-	Confer with J. Millian, W. Durette and P. Gavin regarding deposition preparation; electronic correspondence with B. Baldrate, J. Caughey and N. Bronni regarding deposition schedule, discovery responses and discovery requests; conference call with B. Baldrate regarding same; travel to, through and from airports.
8/26/2010	14063	Brennan, Christyne K	9		-	Conference call with A. Gron regarding deposition schedule; review B. Lentz materials for deposition preparation; confer with B. Lentz regarding deposition preparation; conference calls with J. Caughey regarding same and supplemental production of documents; travel from Greensboro; draft electronic correspondence to J. Caughey and B. Baldrate regarding DU policy research and document collection for depositions.
8/27/2010	14063	Brennan, Christyne K	9.5		-	Confer with B. Baldrate regarding deposition scheduling and discovery; confer with J. Caughey regarding document collection for depositions; revise proposed deposition calendar; electronic correspondence with L. Ertell regarding collection of archived documents; revise discovery requests; confer with B. Baldrate and J. Caughey regarding same; confer with J. Millian and B. Baldrate regarding discovery responses and deposition scheduling; draft electronic correspondence to W. Durette regarding depositions; draft electronic correspondence to B. Lentz and C. Light regarding deposition preparation; draft electronic correspondence to J. Riley regarding B. Lentz and C. Light depositions.
8/29/2010	14063	Brennan, Christyne K	0.8		-	Revise proposed deposition schedule; draft electronic correspondence to J. Millian regarding same; electronic correspondence regarding N. Harmon deposition.
8/30/2010	14063	Brennan, Christyne K	12		-	Electronic correspondence with W. Durette regarding deposition schedule; confer with B. Baldrate regarding same; confer with J. Caughey regarding document collection for B. Lentz and C. Light deposition preparation; confer with J. Millian, B. Baldrate and N. Bronni regarding discovery responses to SunTrust's second set of discovery request; conference call with C. Light regarding deposition preparation; conference call to B. Lentz regarding same; electronic correspondence with B. Lentz regarding same; draft settlement conference memorandum; confer with B. Baldrate and J. Caughey regarding same; finalize notices of deposition and proposed deposition calendar; draft electronic correspondence to M. Dumville, C. Manchester and T. Sabalewski regarding same.
8/31/2010	14063	Brennan, Christyne K	10.5		-	Review C. Light deposition preparation documents; confer with J. Millian, B. Lentz and C. Light regarding deposition preparation; travel to, through and from airports.
9/1/2010	14063	Brennan, Christyne K	1.8		-	Electronic correspondence with S. Millard regarding deposition preparation of M. Denny; conference calls with J. Caughey regarding C. Light documents; electronic correspondence with B. Baldrate regarding same; draft electronic correspondence to K. Guillermo regarding same; conference call with B. Baldrate regarding P. Mangelsdorf deposition; draft electronic correspondence to C. Manchester regarding same.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
9/2/2010	14063	Brennan, Christyne K	9.8	1	575.00	Confer with B. Baldrate regarding reply brief in support of filing sanctions motion on public record and draft settlement conference memorandum; confer with J. Caughey regarding same; conference call with A. Siesling, R. Hughes and W. Justice regarding deposition preparation; conference call to M. Denny regarding same; revise settlement conference memorandum; conference calls with J. Bryant regarding commutation values; electronic correspondence with J. Bryant regarding same; draft electronic correspondence to S. Medeiros and S. Millard regarding settlement memorandum; conference call with M. Flaharty, W. Shapss and J. Spinella regarding Dempsey rebuttal report; confer with J. Caughey regarding documents for deposition preparation and depositions; conference call with S. Medeiros and J. Millian regarding settlement memorandum and B. Lentz and C. Light depositions.
9/3/2010	14063	Brennan, Christyne K	7.5	0.5	312.50	Revise settlement memorandum; draft electronic correspondence to J. Millian regarding same; review L. Borrelli rebuttal report; conference call with D. Hershman and J. Spinella regarding same; review draft brief in support of filing motion for sanctions on public record; conference calls with J. Caughey regarding same; draft electronic correspondence to T. Sabalewski regarding proposed deposition calendar; draft electronic correspondence to W. Durette and S. Long regarding depositions; draft electronic correspondence to A. Gron regarding Smith rebuttal report; draft electronic correspondence to S. Medeiros regarding settlement memorandum; confer with J. Caughey regarding finalizing reply brief in support of filing motion for sanctions on public record; finalize settlement memorandum; review SunTrust settlement demand; draft electronic correspondence to court regarding settlement memorandum; draft electronic correspondence to S. Medeiros and S. Millard regarding same.
9/7/2010	14063	Brennan, Christyne K	8.5		-	Prepare for depositions; conference call to A. Atkins regarding same; conference call with S. Medeiros and D. Walker regarding settlement conference; confer with J. Millian regarding deposition schedule; revise same; conference call with J. Bohrer regarding deposition preparation; electronic correspondence with S. Millard regarding same; draft electronic correspondence to J. Millian regarding same; conference call with A. Gron regarding Smith rebuttal report; electronic correspondence with W. Durette regarding same and settlement conference; draft electronic correspondence to D. Walker regarding settlement conference; conference call with B. Baldrate regarding same and depositions; confer with J. Caughey regarding deposition documents.
9/8/2010	14063	Brennan, Christyne K	10		-	Review documents for A. Siesling deposition preparation; travel to, through and from airports; conference calls with B. Baldrate regarding C. Overby deposition and SunTrust's document production; confer with A. Siesling regarding deposition preparation; conference call with J. Bohrer regarding deposition preparation; conference call with A. Atkins regarding same and deposition dates.
9/9/2010	14063	Brennan, Christyne K	9.3		-	Confer with R. Hughes regarding deposition preparation; conference call with J. Caughey regarding additional documents for R. Hughes deposition preparation; review same; draft electronic correspondence to R. Hughes regarding same; revise deposition calendar; draft electronic correspondence to J. Millian regarding same; confer with W. Justice regarding deposition preparation; electronic correspondence with A. Siesling regarding deposition preparation; conference calls with J. Millian regarding W. Justice deposition preparation; conference calls with J. Caughey regarding documents for settlement conference and Atkins deposition preparation documents; conference call with B. Baldrate regarding S. Huber deposition.
9/10/2010	14063	Brennan, Christyne K	10.3		-	Prepare for M. Denny and A. Atkins deposition preparation; draft electronic correspondence to W. Durette regarding deposition schedule; confer with M. Denny and J. Millian regarding deposition preparation; confer with A. Atkins regarding same; conference call with J. Caughey and B. Baldrate regarding deposition schedule; travel to, through and from airports.
9/12/2010	14063	Brennan, Christyne K	2		-	Travel to Richmond for settlement conference.
9/13/2010	14063	Brennan, Christyne K	11.8		-	Attend settlement conference; confer with M. Dumville, C. Manchester and B. Baldrate regarding deposition schedule; confer with J. Millian, B. Baldrate and J. Caughey regarding same and status; travel from Richmond.
9/14/2010	14063	Brennan, Christyne K	12.3		-	Review J. Bohrer deposition preparation documents; conference call with J. Millian and J. Bohrer regarding deposition preparation; confer with J. Millian and B. Baldrate regarding response to SunTrust's motion to compel electronically stored information; conference call with A. Gron regarding expert deposition schedule; conference call with Court regarding hearing on sanctions motion; draft electronic correspondence to Reed Smith regarding J. Bohrer deposition; draft electronic correspondence to J. Millian regarding deposition preparation of R. Hughes; draft electronic correspondence to R. Hughes regarding same; conference call with S. Millard regarding settlement follow-up, response to SunTrust's motion to compel electronically stored information and depositions; electronic correspondence with K. Guillermo, B. Baldrate and J. Caughey regarding SunTrust documents; draft preliminary response to SunTrust's motion to compel electronically stored information; confer with J. Millian regarding same; revise deposition schedule summary; draft electronic correspondence to J. Millian regarding same.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
9/15/2010	14063	Brennan, Christyne K	12.8		-	Revise preliminary response to SunTrust's motion to compel electronically stored information; conference calls with C. Herrin regarding same; conference call with J. Millian and S. Millard regarding same; revise same; file same electronically; conference call with clerk regarding same; conference call with Judge Payne, J. Millian, W. Durette, M. Dumville and T. Sabalewski regarding same; electronic correspondence with J. Millian and W. Durette regarding sanctions motion hearing; confer with J. Caghey regarding SunTrust clawback documents; conference call to J. Whitt regarding deposition; draft electronic correspondence to B. Baldrate regarding same; draft electronic correspondence to C. Herrin regarding data loss issues; draft electronic correspondence to A. Siesling regarding deposition; conference call with K. Busick regarding knowledge of Count I loans; electronic correspondence with B. Baldrate regarding same; draft electronic correspondence to C. Manchester regarding same; confer with J. Caghey regarding J. Whitt emails; conference call with T. Sabalewski regarding deposition schedule; revise internal deposition schedule; draft electronic correspondence regarding same; prepare for N. Harmon deposition; travel to Richmond.
9/16/2010	14063	Brennan, Christyne K	9.3		-	Continue to prepare for N. Harmon deposition; attend N. Harmon deposition; travel from Richmond; conference call with J. Caghey regarding D. King deposition.
9/17/2010	14063	Brennan, Christyne K	8.8		-	Draft electronic correspondence to C. Herrin regarding data loss issues; review documents for D. Green deposition; conference call with S. Millard and C. Herrin regarding data loss issues; draft electronic correspondence to J. Millian regarding same; conference calls with court regarding hearing on motion for sanctions and motion to file documents publicly; draft electronic correspondence to J. Millian regarding same; conference call with D. Hershman regarding L. Borrelli deposition and rebuttal; draft electronic correspondence to J. Millian regarding same; draft Dempsey deposition outline; confer with J. Caghey regarding documents for L. Borrelli deposition.
9/18/2010	14063	Brennan, Christyne K	3.3		-	Conference call with J. Millian, B. Baldrate and J. Caghey regarding depositions, Gavin data loss, reply in support of sanctions motion and document production issues; conference call with D. Hershman regarding L. Borrelli deposition.
9/19/2010	14063	Brennan, Christyne K	4.5	0.5	287.50	Draft electronic correspondence to M. Dumville regarding response to sanctions motion; conference call with W. Justice regarding deposition; draft electronic correspondence to C. Manchester regarding same; draft electronic correspondence to J. Millian regarding same; draft electronic correspondence to S. Millard regarding W. Justice personnel file; draft electronic correspondence to D. Hershman regarding L. Borrelli deposition; draft electronic correspondence to S. Millard regarding relationship managers for Countrywide and HSBC related to interest only first combo loans; draft electronic correspondence to KPMG regarding DU search terms; draft electronic correspondence to C. Herrin regarding data loss issues; draft electronic correspondence to M. Flaharty regarding J. Dempsey deposition; confer with B. Baldrate regarding depositions; continue to draft J. Dempsey deposition outline.
9/20/2010	14063	Brennan, Christyne K	12.8	0.2	114.55	Confer with J. Caghey regarding clawback documents, D. Green deposition documents, KPMG issues and deposition schedule; conference call with A. Gron regarding Smith reply report; conference call with S. Millard and C. Herrin regarding data loss issues; draft correspondence to M. Dumville regarding same; electronic correspondence with T. Sabalewski and J. Gold regarding L. Borrelli deposition; conference calls with C. Herrin regarding backup tape restoration; electronic correspondence with W. Durette regarding depositions; draft electronic correspondence to S. Millard and C. Herrin regarding correspondence to M. Dumville regarding Gavin data loss; conference call with J. Millian and S. Millard regarding same; conference call with J. Millian regarding same, reply in support of sanctions motion, 30(b)(6) depositions and nonsearchable pdf documents; confer with J. Caghey regarding correspondence to M. Dumville regarding Gavin data loss; draft D. Green deposition outline.
9/21/2010	14063	Brennan, Christyne K	12.5	1	575.00	Travel to Richmond; review SunTrust opposition to sanctions motion; conference call with court regarding hearing date for sanctions motion; draft electronic correspondence to J. Millian regarding same; take deposition of D. Green; conference call to J. Whitt regarding deposition; draft electronic correspondence to J. Millian regarding same; conference calls with J. Caghey regarding reply in support of sanctions motion; confer with M. Flaharty regarding J. Dempsey deposition; conference calls with B. Baldrate regarding reply in support of sanctions motion, 30(b)(6) depositions and deposition preparation.
9/22/2010	14063	Brennan, Christyne K	13	0.5	287.50	Review electronic correspondence regarding 30(b)(6) depositions and reply; prepare for J. Dempsey deposition; conference call with Court regarding reply in support of sanctions motion; take J. Dempsey deposition; confer with M. Flaharty regarding same; conference call with C. Herrin and L. Ertell regarding data issues; conference call with B. Baldrate regarding 30(b)(6) depositions, summary judgment motion and data loss issues; conference call with J. Caghey regarding deposition preparation documents and schedule; travel from Richmond.

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9/23/2010	14063	Brennan, Christyne K	10.5	1	575.00	Conference call with court regarding reply in support of sanctions motion; electronic correspondence regarding same and hearing dates for sanctions motion; review electronic correspondence regarding 30(b)(6) depositions; conference call to T. Bailey regarding same; conference call with S. Millard regarding same; draft electronic correspondence to D. Walker and C. Herrin regarding same; revise internal deposition schedule; draft electronic correspondence to J. Millian and W. Durette regarding same; conference call with court, J. Millian and M. Dumville regarding sanctions motion hearing; conference call with B. Baldrate and J. Caughey regarding same and J. Clack deposition; prepare for T. Honaker and V. Bolick depositions.
9/24/2010	14063	Brennan, Christyne K	10.5		-	Conference call with B. Baldrate regarding 30(b)(6) depositions; take depositions of T. Honaker and V. Bolick; draft electronic correspondence to M. Flanagan regarding Count II issues; travel to and from Richmond.
9/26/2010	14063	Brennan, Christyne K	9.8		-	Review draft response to SunTrust's motion to compel regarding ESI; draft electronic correspondence to J. Caughey regarding same; prepare for deposition preparation of C. Herrin and D. Walker; travel to Richmond; confer with C. Herrin regarding deposition preparation; confer with D. Walker regarding same.
9/27/2010	14063	Brennan, Christyne K	12		-	Confer with D. Walker and C. Herrin regarding 30(b)(6) deposition; defend C. Herrin deposition; defend D. Walker deposition; draft electronic correspondence to J. Millian regarding 30(b)(6) depositions; conference calls with J. Caughey regarding same, Gavin ESI and DU documents; confer with A. Gron regarding deposition; conference calls with B. Baldrate regarding same, UGS deposition and motion to quash subpoena; travel from Richmond.
9/28/2010	14063	Brennan, Christyne K	8	1.5	862.50	Prepare M. Flaharty for deposition; draft electronic correspondence to KPMG regarding Gavin data and documents; review SunTrust's responses to discovery requests; draft electronic correspondence to M. Flanagan regarding same concerning Count II loans; conference call with M. Flanagan regarding same; review SunTrust's motion to quash Fortin subpoena; electronic correspondence with R. Mastro regarding same; conference call with M. Gilroy regarding same; draft electronic correspondence to M. Gilroy regarding same; draft electronic correspondence to C. Herrin regarding review of work tickets for custodian data losses; electronic correspondence with KPMG regarding data gap review; conference call with D. Hershman regarding deposition preparation; electronic correspondence with T. Stroh regarding deposition transcripts.
9/29/2010	14063	Brennan, Christyne K	12.3		-	Confer with M. Flaharty regarding deposition; defend M. Flaharty deposition; confer with J. Millian and D. Hershman regarding deposition preparation; draft correspondence to J. Gold regarding supplemental production of documents considered by D. Hershman; review documents for deposition of C. Overby, M. Patrick, and J. Lombardo; confer with J. Caughey regarding same; confer with B. Baldrate regarding policies concerning DU and other lenders; confer with J. Millian, B. Baldrate and J. Caughey regarding same.
9/30/2010	14063	Brennan, Christyne K	11.8		-	Prepare for ESI depositions of SunTrust; electronic correspondence with J. Caughey regarding same and Pettitt email data; take deposition of C. Overby; take deposition of M. Pasick; take deposition of J. Lombardo; travel to and from Richmond; conference call with B. Baldrate regarding summary judgment motions and ESI issues.
10/1/2010	14063	Brennan, Christyne K	11.8		-	Confer with J. Millian and B. Baldrate regarding motions for summary judgment; revise motion for summary judgment regarding SunTrust's obligation to continue paying premiums; draft electronic correspondence to J. Millian regarding same; conference call with S. Millard regarding ESI issues and 30(b)(6) depositions; draft electronic correspondence to S. Millard regarding ESI opposition; draft electronic correspondence to S. Medeiros and S. Millard regarding SunTrust's sanctions team entry of appearance; confer with B. Baldrate and J. Caughey regarding motion for summary judgment on SunTrust's Count I; review and revise motion for summary judgment on SunTrust's Count I.
10/2/2010	14063	Brennan, Christyne K	1		-	Electronic correspondence with J. Millian, B. Baldrate and J. Caughey regarding motions for summary judgment and statement of undisputed facts.
10/3/2010	14063	Brennan, Christyne K	10.8		-	Draft electronic correspondence to J. Conn regarding premium payment motion for summary judgment; confer with J. Millian regarding same; conference calls with J. Conn regarding same; draft electronic correspondence to W. Durette regarding deposition transcripts and McGuire Woods; draft electronic correspondence to S. Medeiros regarding McGuire Woods; draft statement of undisputed facts for premium payment motion for summary judgment; confer with J. Caughey and B. Baldrate regarding Count I motion for summary judgment; revise premium payment motion for summary judgment; draft electronic correspondence to J. Millian regarding same.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
10/4/2010	14063	Brennan, Christyne K	15.5		-	Conference calls with J. Bryant regarding declaration in support of premium payments motion for summary judgment; draft same; review and revise memorandum in support of premium payments motion for summary judgment; draft motion and proposed order for same; finalize premium payments motion for summary judgment for filing; file same electronically; confer with J. Millian and B. Baldrate regarding Count I motion for summary judgment and exhibits; confer with B. Baldrate and J. Caughey regarding same; review SunTrust's motion for summary judgment; revise memorandum in support of Count I motion for summary judgment; draft motion and proposed order for same; prepare same for filing; file same and exhibits electronically; draft electronic correspondence to S. Medeiros and S. Millard regarding motions for summary judgment; confer with J. Millian, B. Baldrate and J. Caughey regarding status conference.
10/5/2010	14063	Brennan, Christyne K	11.5		-	Travel to and from Richmond; confer with J. Millian, R. Mastro, W. Wegner, C. Dusseault, B. Baldrate and J. Caughey regarding sanctions and status conference; attend status conference; conference call with S. Medeiros, J. Millian, R. Mastro, W. Wegner, C. Dusseault, B. Baldrate and J. Caughey regarding same.
10/6/2010	14063	Brennan, Christyne K	6.3	5	2,852.18	Confer with B. Baldrate and J. Caughey regarding correspondence to SunTrust regarding Pettitt entries on privilege log; conference call with J. Millian and B. Baldrate regarding same and R. Fortin deposition; draft electronic correspondence to M. Dumville regarding R. Fortin deposition; confer with S. Millard regarding backup tapes and court status conference; confer with B. Baldrate and J. Caughey regarding SunTrust's waiver argument; review C. Light and B. Lentz erratas; draft correspondence to court reporter regarding same; conference calls with J. Caughey regarding metadata requested by KPMG related to M. Pettitt doctored documents; review exhibits to SunTrust's opposition to motion for summary judgment.
10/7/2010	14063	Brennan, Christyne K	6.5	3	1,725.00	Conference call with M. Flanagan regarding individuals identified by SunTrust as having knowledge of Count II loans; confer with B. Baldrate regarding case status and action items; confer with J. Caughey regarding same; review subpoena duces tecum of R. Fortin; confer with J. Millian, B. Baldrate and J. Caughey regarding same; conference call with W. Wegner, C. Dusseault, J. Zelaney and B. Baldrate regarding sanctions hearing; confer with J. Millian regarding same; electronic correspondence with G. Schill regarding R. Fortin deposition; draft electronic correspondence to B. Baldrate and J. Caughey regarding same; draft electronic correspondence to S. Medeiros and S. Millard regarding court order from status conference.
10/8/2010	14063	Brennan, Christyne K	1.5	1.5	862.50	Electronic correspondence with G. Schill regarding R. Fortin deposition and subpoena; draft electronic correspondence to B. Baldrate and J. Caughey regarding same; conference call with J. Millian, R. Mastro, W. Wegner, C. Dusseault, B. Baldrate and J. Caughey regarding sanctions mini-trial; review motion for enlargement of trial schedule; draft electronic correspondence to B. Baldrate and J. Caughey regarding same.
10/19/2010	14063	Brennan, Christyne K	5.8	2	1,140.09	Review various electronic correspondence regarding sanctions hearing and status; confer with B. Baldrate and J. Caughey regarding status; review SunTrust's responses to interrogatories, SunTrust's and United Guaranty's motions in limine, SunTrust's and United Guaranty's oppositions to motions for summary judgment; review draft opposition to SunTrust's motion to strike; confer with J. Caughey regarding same.
10/20/2010	14063	Brennan, Christyne K	15.3	2	1,146.24	Draft reply in support of motion for summary judgment on count I of SunTrust's third amended complaint; confer with J. Caughey and B. Baldrate regarding same; review and revise same; confer with J. Millian, B. Baldrate and J. Caughey regarding same; review various electronic correspondence regarding motion for limited discovery and continuance of sanctions hearing; confer with B. Baldrate regarding same.
10/21/2010	14063	Brennan, Christyne K	8.3	2	1,143.07	Continue to revise draft reply in support of motion for summary judgment on count I of SunTrust's third amended complaint; confer with J. Caughey and B. Baldrate regarding motion for limited discovery and continuance of sanctions hearing; review electronic correspondence regarding same; conference calls with G. French regarding declaration for motion for summary judgment on count iv; revise same; revise reply in support of motion for summary judgment on count IV of counterclaim; prepare same for filing; file same electronically; confer with B. Baldrate and J. Caughey regarding preparation for sanctions hearing; review electronic correspondence regarding same; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding replies in support of motions for summary judgment.
10/22/2010	14063	Brennan, Christyne K	5.8	4	2,280.17	Conference calls with A. Gron and D. Hershman regarding trial continuance; draft electronic correspondence to M. Flaharty regarding same; conference call with M. Flanagan regarding Count II issues; draft electronic correspondence to S. Millard regarding interview of K. Busick; electronic correspondence with K. Busick regarding same; conference calls with court regarding call with Payne concerning motion for additional discovery and continuance of sanctions hearing; electronic correspondence with R. Mastro, G. Schill and T. Spahn regarding same; electronic correspondence regarding sanctions hearing; conference call with C. Dusseault and J. Caughey regarding cross-examination outlines for M. Dumville and J. Clack; confer with J. Caughey regarding same.



Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
10/25/2010	14063	Brennan, Christyne K	6.5	5	2,875.00	Review draft examination outline of J. Clack; confer with J. Caughey regarding same; conference call with court, SunTrust team and Gibson Dunn team regarding motion for additional discovery and continuance of sanctions hearing; conference call with J. Millian, R. Mastro, W. Wegner, C. Dusseault, B. Baldrate and W. Durrette regarding sanctions hearing; conference call to C. Manchester regarding motions in limine; conference call with C. Walsh, W. Wegner, B. Baldrate, J. Zelenay, and J. Caughey regarding technology presentation at sanctions hearing; confer with B. Baldrate and J. Caughey regarding admissions stipulation; electronic correspondence regarding motions in limine.
10/26/2010	14063	Brennan, Christyne K	12	11	6,325.00	Confer with B. Baldrate and J. Caughey regarding sanctions hearing; review revised J. Clack examination outline; conference call with S. Millard regarding J. Gaines errata; conference call with J. Gaines regarding same; draft electronic correspondence to J. Millian regarding same; conference call with chambers regarding courtroom technology for hearing; draft electronic correspondence to C. Walsh regarding same; draft correspondence to court regarding permission to bring technology into courtroom; electronic correspondence to S. Neal regarding same; confer with M. Flanagan, F. Lee, B. Baldrate and J. Caughey regarding claims files; confer with B. Baldrate regarding admissions stipulation for sanctions hearing; conference call with J. Millian, R. Mastro, C. Dusseault, W. Durrette and B. Baldrate regarding same; review and revise same; conference call with M. Flanagan and K. Busick regarding Count II issues; file opposition to motion to strike electronically; confer with J. Millian regarding S. Thurman deposition; draft electronic correspondence to P. Gavin regarding Count II loan requalification project; revise J. Clack examination outline; confer with J. Caughey regarding same.
10/27/2010	14063	Brennan, Christyne K	13.3	13.3	7,618.75	Review R. Fortin deposition transcript in preparation for S. Thurman deposition; electronic correspondence with C. Manchester regarding motions in limine; confer with J. Caughey and B. Baldrate regarding S. Thurman examination outline; conference call with C. Dusseault regarding sanctions hearing preparation and J. Clack and M. Dumville examination outlines; review J. Gaines and J. Bohrer erratas; conference call with J. Bohrer regarding errata; draft consent motion, memorandum and agreed order for continuance of motions in limine briefing; draft electronic correspondence to C. Manchester regarding same; conference call with FTI, B. Baldrate and J. Caughey regarding technology issues for sanctions hearing; electronic correspondence with M. Flanagan regarding Count II issues; prepare S. Thurman deposition outline; confer with B. Baldrate and J. Caughey regarding status of examination outlines; conference call with J. Zelaney, B. Baldrate and J. Caughey regarding same.
10/28/2010	14063	Brennan, Christyne K	14.3	14.3	8,193.75	Continue to prepare for S. Thurman deposition; finalize consent motion regarding deferral of motions in limine; electronic correspondence with C. Manchester regarding same; file same electronically; confer with J. Caughey and B. Baldrate regarding sanctions hearing examination outlines; depose S. Thurman; travel to and from Richmond for same; conference call with J. Caughey regarding topics for M. Dumville examination outline and witness binders; conference call with B. Baldrate regarding witness binders and closing argument powerpoint; confer with J. Millian regarding D. Hovatter examination outline; review objections to Count II interrogatories; confer with M. Flanagan regarding same; draft electronic correspondence to SunTrust regarding same.
10/29/2010	14063	Brennan, Christyne K	14.3	14.3	8,193.75	Confer with J. Caughey regarding M. Dumville deposition; confer with B. Baldrate regarding actions items for sanction hearing preparation; electronic correspondence with W. Durrette regarding stipulation; conference call with R. Mastro and B. Baldrate regarding witness binders; review and revise index of documents admitted pursuant to stipulation; confer with B. Baldrate regarding documents admitted pursuant to stipulation; electronic correspondence with G. Schill regarding same; electronic correspondence with J. Millian regarding D. Hovatter; electronic correspondence regarding sanctions hearing; revise examination outline of M. Dumville; draft electronic correspondence to C. Dusseault regarding same; revise examination outline of J. Clack; draft electronic correspondence to C. Dusseault regarding same; draft electronic correspondence to FTI regarding same for technology presentation.
10/30/2010	14063	Brennan, Christyne K	9.8	9.8	5,606.25	Travel to Richmond; prepare impeachment video clips with D. Negrete for J. Clack examination; revise J. Clack examination outline; confer with C. Dusseault regarding same and M. Dumville examination outline; confer with B. Baldrate regarding S. Thurman examination, closing argument technology presentation and witness binders; file motion for sanctions electronically.
10/31/2010	14063	Brennan, Christyne K	20.3	20.3	11,643.75	Review D. Hovatter deposition for examination outline; draft electronic correspondence to J. Millian regarding same; revise M. Dumville examination outline; confer with J. Caughey regarding same; finalize J. Clack examination outline; confer with C. Dusseault regarding same; revise D. Hovatter examination outline; confer with J. Millian regarding same.
11/1/2010	14063	Brennan, Christyne K	17.8	17.8	10,206.25	Continue to revise S. Hovatter examination outline; confer with C. Walsh regarding same; attend sanctions hearing; confer with C. Dusseault and J. Caughey regarding M. Dumville examination; revise outline for same.
11/2/2010	14063	Brennan, Christyne K	15.8	15.8	9,056.25	Prepare documents for sanctions motion hearing; attend sanctions motions hearing; discuss case strategy; prepare documents for closing argument.
11/3/2010	14063	Brennan, Christyne K	10.5	10.5	6,037.50	Confer with C. Dusseault and D. Negrete regarding revised M. Dumville examination outline; attend sanctions motion hearing; travel from Richmond.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
11/4/2010	14063	Brennan, Christyne K	1.3		-	Conference call with A. Atkins regarding errata; electronic correspondence with D. Hershman regarding same; review D. Hershman errata; review A. Atkins errata; conference call with court regarding hearing transcript; review subpoena to NIA Consulting; draft electronic correspondence to M. Flanagan regarding same.
11/5/2010	14063	Brennan, Christyne K	4.3		-	Confer with M. Flanagan, B. Baldrate and J. Caughey regarding Count II loans discovery; draft electronic correspondence to L. Ertell regarding supplemental claims file production; conference call with M. Flanagan and P. Gavin regarding Count II requalification project; confer with J. Caughey regarding template for review of Count II loans by contract attorneys; conference call with B. Baldrate regarding same; draft electronic correspondence to P. Gavin regarding Count II claims paid; draft electronic correspondence to S. Millard regarding subpoena to NIA Consulting; conference call with court regarding trial dates; conference call to C. Manchester regarding same; electronic correspondence regarding same.
11/8/2010	14063	Brennan, Christyne K	7.3	1	571.06	Confer with J. Caughey regarding Count II loans questionnaire; attend meeting with contract attorneys regarding review of Count II claims files; electronic correspondence with M. Dumville and GDC team regarding trial dates; electronic correspondence with J. Millian regarding pleadings for Wall Street Journal; review electronic correspondence from GDC team regarding post-sanctions hearing briefing; confer with B. Baldrate regarding same; confer with B. Baldrate and J. Caughey regarding Count II discovery responses; conference call with J. Millian, W. Wegner, W. Durette, C. Dusseault and B. Baldrate regarding trial on Count I; conference call with J. Payne, M. Dumville, and C. Manchester and GDC team regarding same; confer with J. Millian and B. Baldrate regarding post-sanctions hearing brief; review C. Herrin errata; conference call with M. Flanagan regarding Count II issues and documents; electronic correspondence regarding sanctions hearing transcripts; confer with J. Caughey regarding Count II search terms and responses to document requests.
11/9/2010	14063	Brennan, Christyne K	7.8	2	1,142.63	Conference call with S. Millard regarding SunTrust's discovery requests concerning McKinsey project and additional custodians; confer with B. Baldrate regarding same; conference call with M. Flanagan regarding same; conference call with C. Manchester regarding agreed scheduling order regarding final pretrial deadlines and hearing on motion to strike; draft electronic correspondence to J. Millian regarding same; confer with J. Caughey regarding Count II discovery responses and agreed scheduling order regarding final pretrial deadlines; confer with B. Baldrate regarding post-hearing briefs; confer with N. Bronni and B. Baldrate regarding research for same; confer with J. Millian and B. Baldrate regarding post-sanctions hearing briefing on SunTrust's fraud claim; conference call with B. Baldrate and J. Zelaney regarding post-sanctions briefing; review and revise agreed scheduling order; draft electronic correspondence to C. Manchester regarding same; conference call with J. Millian, W. Wegner, R. Mastro, C. Dusseault, and B. Baldrate regarding post-sanctions hearing briefing; conference call with M. Flanagan and B. Baldrate regarding Count II discovery responses; confer with B. Baldrate and J. Caughey regarding Count II discovery responses; draft electronic correspondence to P. Gavin regarding Count II loans; draft electronic correspondence to S. Millard regarding NIA Consulting contract; draft electronic correspondence to S. Millard regarding McKinsey project.
11/10/2010	14063	Brennan, Christyne K	9.8	4	2,288.27	Conference call to Court regarding hearing transcript; confer with J. Caughey regarding Count II discovery responses; review and revise same; conference call to C. Scheeler regarding McKinsey project; draft electronic correspondence to L. Ertell regarding supplemental claims files; electronic correspondence with M. Flanagan regarding Count II custodian; conference call to J. McLeod regarding same; draft electronic correspondence to S. Millard regarding additional custodians for Count II discovery; conference call with B. Baldrate and J. Zelaney regarding post-sanctions hearing briefing; draft electronic correspondence to D. Hershman, A. Gron and M. Flaharty regarding trial date; draft post-sanctions hearing brief regarding facts relevant to sanctions.
11/11/2010	14063	Brennan, Christyne K	10.8	9	5,151.04	Continue to draft post-hearing brief regarding alternative sanctions; confer with B. Baldrate regarding same; confer with M. Flanagan, B. Baldrate and J. Caughey regarding Count II discovery issues; confer with J. Caughey regarding same and post-hearing brief regarding fraud claim.
11/12/2010	14063	Brennan, Christyne K	9.3	8	4,575.27	Continue to draft post-sanctions hearing brief; confer with B. Baldrate regarding same; conference call with B. Baldrate and J. Zelaney regarding same; electronic correspondence with J. Zelaney regarding same; review and revise draft post-hearing sanctions brief regarding fraud claims; confer with J. Caughey and B. Baldrate regarding same; conference call with M. Flanagan and P. Gavin regarding requalification of Count II loans; draft electronic correspondence to P. Gavin regarding same.
11/13/2010	14063	Brennan, Christyne K	1.3	1.3	718.75	Review revised post-hearing sanctions brief regarding alternative sanctions; electronic correspondence with J. Zelaney regarding same.
11/14/2010	14063	Brennan, Christyne K	4.8	4.8	2,731.25	Review and revise post-sanctions hearing briefs; conference calls with B. Baldrate regarding same.
11/15/2010	14063	Brennan, Christyne K	2.8	1	564.73	Conference call with M. Hines regarding McKinsey project; conference call with L. Ertell regarding supplemental claims files; confer with J. Caughey regarding information for Count II discovery responses; review and revise post-hearing sanctions briefs; conference calls with B. Baldrate and J. Caughey regarding same.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
11/16/2010	14063	Brennan, Christyne K	2		-	Conference call with W. Phifer and J. Caughey regarding Count II custodians and documents; confer with J. Caughey regarding same; review summary of Count II custodians; revise correspondence to S. Millard regarding same; draft electronic correspondence to J. Caughey regarding same; confer with M. Flanagan and J. Caughey regarding responses to SunTrust's Count II document requests; conference call to L. Ertell regarding supplemental claims file production; draft electronic correspondence to M. Flanagan regarding pretrial order.
11/17/2010	14063	Brennan, Christyne K	5.3	1	569.58	Draft electronic correspondence to S. Millard regarding investigatory services contracts; draft electronic correspondence to K. Busick regarding same; confer with B. Baldrate regarding post-sanction hearing briefs; conference call with J. Millian, B. Baldrate, and J. Caughey regarding same; confer with B. Baldrate and J. Caughey regarding same; confer with J. Caughey regarding Count II discovery issues; conference call with S. Millard and J. Caughey regarding subrogation issue and Count II custodians; conference call with P. Gavin, N. Sellers and M. Flanagan regarding Count II requalification project.
11/19/2010	14063	Brennan, Christyne K	1.8	1	559.03	Review revised post-hearing sanctions briefs and various electronic correspondence regarding comments on same; review electronic correspondence from J. Caughey regarding Count II custodians and discovery responses.
11/21/2010	14063	Brennan, Christyne K	0.5	0.5	287.50	Review various electronic correspondence regarding revisions to post-hearing sanctions briefs.
11/22/2010	14063	Brennan, Christyne K	7.8	7.8	4,456.25	Confer with B. Baldrate and J. Caughey regarding post-sanctions hearing briefs; revise post-sanctions hearing briefs; confer with J. Millian regarding same; file same electronically; review SunTrust's post-hearing sanctions briefs.
11/23/2010	14063	Brennan, Christyne K	3.5	1	575.00	Draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding post-hearing sanctions briefs; confer with B. Baldrate regarding responses to post-hearing sanctions briefs; confer with B. Baldrate and J. Caughey regarding response to SunTrust's post-hearing sanctions brief concerning fraud claims; confer with M. Flanagan and J. Caughey regarding Count II discovery; confer with J. Caughey regarding Count II document collection; draft Count I case calendar.
11/24/2010	14063	Brennan, Christyne K	0.8	0.8	431.25	Confer with J. Caughey regarding reply to SunTrust's post-hearing sanction brief concerning fraud claims.
11/29/2010	14063	Brennan, Christyne K	3.8	3	1,702.30	Electronic correspondence regarding post-hearing sanctions responses; confer with B. Baldrate regarding status of same; conference call with J. Zelaney and B. Baldrate regarding same; confer with J. Caughey regarding same and status of contract attorney review of documents; review draft post-hearing sanctions response regarding SunTrust's fraud claims; confer with J. Caughey and B. Baldrate regarding same.
11/30/2010	14063	Brennan, Christyne K	5	1	575.00	Conference call with M. Flanagan regarding Count II status; conference call with B. Hall and B. Baldrate regarding case status; draft electronic correspondence to B. Hall regarding pretrial order; review and revise post-sanctions hearing response brief regarding fraud claims; confer with J. Caughey regarding same and Count II document collection; confer with B. Baldrate regarding post-sanctions hearing response brief regarding fraud claims; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding same.
12/1/2010	14063	Brennan, Christyne K	6.5	6	3,450.00	Review and revise post-hearing sanction response brief regarding alternative sanctions; confer with B. Baldrate and J. Caughey regarding same; confer with J. Caughey regarding Count II document review.
12/2/2010	14063	Brennan, Christyne K	3	2	1,150.00	Continue to revise post-hearing sanction response brief regarding alternative sanctions; confer with B. Baldrate and J. Caughey regarding same; confer with J. Caughey regarding Count II issues; conference call with M. Flanagan regarding same; confer with J. Millian, B. Baldrate and J. Caughey regarding post-hearing response briefs and motions for summary judgment hearing.
12/3/2010	14063	Brennan, Christyne K	6.8	6	3,424.63	Review and revise post-hearing sanctions response briefs; discuss ethics opinions with N. Adams, B. Baldrate and J. Caughey; confer with J. Caughey regarding Count II issues; conference call with M. Flanagan and J. Caughey regarding same; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding post-hearing sanctions response briefs.
12/5/2010	14063	Brennan, Christyne K	0.8	0.8	431.25	Review SunTrust's post-hearing sanctions response briefs.
12/6/2010	14063	Brennan, Christyne K	13.8	2	1,145.83	Prepare documents for summary judgment hearing; conference call with court regarding oral argument structure for same and sanctions; draft electronic correspondence to J. Millian and W. Wegner regarding same; travel to Richmond; confer with J. Millian, W. Wegner, B. Baldrate and J. Caughey regarding summary judgment and sanctions motions; draft summary of sanctionable conduct as to SunTrust, outside counsel and in-house counsel; confer with B. Baldrate and J. Caughey regarding same and argument outline for opposition to SunTrust's waiver argument.
12/7/2010	14063	Brennan, Christyne K	12.5	5	2,875.00	Continue to revise summary of sanctionable conduct as to SunTrust; revise summary of fraud claims argument; review and revise Count I argument outline; confer with J. Caughey regarding same; review and revise Count IV argument outline; confer with J. Millian regarding same; attend summary judgment motion hearing; travel from Richmond.
12/8/2010	14063	Brennan, Christyne K	0.8		-	Conference call with M. Flanagan regarding status; conference call with J. Millian, W. Wegner, J. Caughey and B. Baldrate regarding motions for summary judgment and sanctions hearing.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
12/9/2010	14063	Brennan, Christyne K	1.3		-	Confer with J. Caughey regarding Count II issues; review NIA and IMARC agreements; confer with J. Caughey regarding same; draft electronic correspondence to S. Millard regarding same.
12/10/2010	14063	Brennan, Christyne K	1		-	Confer with J. Caughey regarding Count II issues and production and preparation of Count I trial exhibit list.
12/13/2010	14063	Brennan, Christyne K	3		-	Confer with J. Caughey regarding Count II document collection and discovery and Count I exhibit list; conference call with B. Baldrate regarding case status; conference call to D. Daffron regarding summary judgment and sanctions motion hearing transcripts; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding same; conference call with J. Millian and J. Caughey regarding settlement conference and trial preparation; confer with J. Caughey regarding documents for settlement conference; review NIA objections to subpoena; draft electronic correspondence to S. Millard regarding same.
12/14/2010	14063	Brennan, Christyne K	0.3		-	Electronic correspondence regarding SunTrust settlement demand.
12/16/2010	14063	Brennan, Christyne K	2.3		-	Confer with B. Baldrate regarding Gavin data; conference call with C. Herrin and J. Caughey regarding same; conference call with A. Beschloss and J. Caughey regarding same; draft electronic correspondence to C. Herrin, A. Beschloss and K. Ahlgren regarding same; draft electronic correspondence to T. Sabalewski regarding same; confer with J. Caughey regarding contract attorney review of documents.
12/17/2010	14063	Brennan, Christyne K	2.8		-	Electronic correspondence with T. Sabalewski regarding Gavin missing ESI; electronic correspondence with C. Herrin, A. Beschloss and K. Ahlgren regarding same; confer with B. Baldrate, J. Caughey and D. Chiang regarding brief concerning testimony of J. Gold and M. Dumville at trial; draft electronic correspondence to S. Millard regarding order concerning Gavin ESI and status of same; electronic correspondence with D. Hersham regarding trial and preparation.
12/20/2010	14063	Brennan, Christyne K	0.5		-	Electronic correspondence with J. Caughey regarding Count II document collection; confer with J. Caughey regarding same; electronic correspondence regarding Gavin ESI data.
12/21/2010	14063	Brennan, Christyne K	2.8	2.8	1,581.25	Review draft brief regarding testimony of J. Gold and M. Dumville; conference call with W. Wegner, C. Dusseault, B. Baldrate, J. Zelaney, J. Caughey, B. Swain and C. Walsh regarding jury research; conference call with W. Wegner, C. Dusseault, B. Baldrate, J. Zelaney and J. Caughey regarding briefing on the testimony of J. Gold and M. Dumville; conference calls with B. Baldrate regarding same and Gavin ESI.
12/22/2010	14063	Brennan, Christyne K	0.3		-	Electronic correspondence with D. Chiang regarding contract attorney review of documents.
12/28/2010	14063	Brennan, Christyne K	1		-	Electronic correspondence with A. Beschloss, K. Ahlgren and C. Herrin regarding Gavin ESI data; draft electronic correspondence to T. Sabalewski regarding same; draft electronic correspondence to J. Caughey and D. Chiang regarding contract attorney review of documents; review SunTrust's supplemental submission regarding Count II scheduling.
12/29/2010	14063	Brennan, Christyne K	0.5	0.5	287.50	Electronic correspondence with D. Chiang regarding brief concerning testimony of J. Gold and M. Dumville; conference call with J. Caughey regarding same.
12/30/2010	14063	Brennan, Christyne K	2.5	2.5	1,437.50	Review draft brief concerning testimony of J. Gold and M. Dumville; conference call with D. Chiang regarding same.
1/3/2011	14063	Brennan, Christyne K	9.8	6	4,029.34	Electronic correspondence regarding Gavin ESI data; conference call with T. Sabalewski, Encore, C. Herrin, L. Ertell, A. Beschloss, K. Ahlgren, B. Baldrate and J. Caughey regarding same; conference call to S. Millard regarding same; review and revisedraft brief regarding M. Dumville and J. Gold testimony; conference calls with J. Caughey regarding same.
1/4/2011	14063	Brennan, Christyne K	2.5	1	675.00	Review Master Policy regarding claim obligations after MCL is reached; draft electronic correspondence to J. Millian regarding same; review SunTrust's opposition to consolidation of Counts I and II trial schedule; conference call with B. Hall, W. Wegner and B. Baldrate regarding status; confer with B. Baldrate regarding Count II schedule; review comments regarding draft brief concerning the testimony of J. Gold and M. Dumville.
1/5/2011	14063	Brennan, Christyne K	7.8	6	4,024.04	Revise brief regarding the testimony of J. Gold and M. Dumville; conference calls with B. Baldrate and J. Caughey regarding same; draft electronic correspondence to S. Millard regarding Gavin ESI data; conference call with J. Caughey regarding R. Hughes deposition testimony concerning ESI; conference call with S. Millard regarding same and Gavin data; draft electronic correspondence to SunTrust regarding same; draft electronic correspondence to J. Millian regarding same; conference call with W. Wegner, C. Dusseault, B. Baldrate and J. Caughey regarding brief concerning testimony of J. Gold and M. Dumville; review comments on same; conference call with C. Dusseault and J. Caughey regarding same; confer with D. Chiang regarding reply in support of motion to consolidate Counts I and II.
1/6/2011	14063	Brennan, Christyne K	4.8	4.8	3,206.25	Review and revise brief regarding J. Gold and M. Dumville testimony; conference calls with B. Baldrate and J. Caughey regarding same; draft electronic correspondence to S. Medeiros, B. Hall and S. Millard regarding same; review comments regarding same; conference call with B. Baldrate regarding Gavin ESI; conference call with B. Baldrate regarding motion to consolidate Counts I and II; draft electronic correspondence to T. Sabalewski regarding Gavin ESI.
1/7/2011	14063	Brennan, Christyne K	3.8	2	1,332.24	Revise brief regarding testimony of J. Gold and M. Dumville; conference calls with B. Baldrate and J. Caughey regarding same and Count II issues; electronic correspondence with S. Millard regarding Gavin ESI; draft electronic correspondence to T. Sabalewski regarding same; draft electronic correspondence to C. Herrin regarding same.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
8/1/2010	13336	Bronni, Nicholas Jaco	1.6		-	Review pleadings.
8/2/2010	13336	Bronni, Nicholas Jaco	8		-	Review pleadings; review draft motion for sanctions; research concerning response to UGS and UGC subpoenas; meet with K. Brennan and B. Baldrate regarding same.
8/3/2010	13336	Bronni, Nicholas Jaco	13.7		-	Research concerning response to UGS and UGC subpoenas; draft response to same; meet with J. Millian, K. Brennan and B. Baldrate regarding same; revise reply to UGC subpoena.
8/4/2010	13336	Bronni, Nicholas Jaco	8.8	2	990.00	Draft response to UGS subpoena; research concerning sanctions motion; review Dempsey expert report; analyze UGS subpoena.
8/5/2010	13336	Bronni, Nicholas Jaco	9.4	9.4	4,653.00	Draft sanctions brief; meet with B. Baldrate regarding same; revise brief in response to same; conference call with J. Millian and B. Baldrate regarding sanctions brief; review statement of facts for sanctions brief.
8/6/2010	13336	Bronni, Nicholas Jaco	10.1	8	3,960.00	Draft Motions, Proposed Orders for sanctions motion, pre-sanctions motion; revise response to UGS subpoena in response to comments from J. Millian and C. Brennan; revise sanctions brief to include additional material from statement of facts draft.
8/8/2010	13336	Bronni, Nicholas Jaco	0.4	0.4	198.00	Revise sanctions brief to include additional material from statement of facts draft.
8/9/2010	13336	Bronni, Nicholas Jaco	9.9	7	3,465.00	sanctions motion appendix; review Second Request for Production of Documents, Interrogatories; draft memorandum regarding information needed to reply to same; meet with C. Brennan and J. Caughey regarding same.
8/10/2010	13336	Bronni, Nicholas Jaco	9.6	8	3,960.00	Draft responses to second request for production; revise sanctions motion appendix in connection with updated sanctions motion; revise sanctions pre-filing brief.
8/11/2010	13336	Bronni, Nicholas Jaco	8	4	1,980.00	Draft responses to second set of interrogatories; conference call regarding same; revise sanctions motion appendix.
8/12/2010	13336	Bronni, Nicholas Jaco	9.2	1	495.00	Revise responses to second set of interrogatories and requests for production; meet with B. Baldrate regarding same; revise sanctions motion.
8/13/2010	13336	Bronni, Nicholas Jaco	9.2	3	1,485.00	Revise responses to second set of interrogatories and requests for production; meet with B. Baldrate regarding same; draft response to SunTrust brief regarding page limitations, filing under seal; research regarding same.
8/16/2010	13336	Bronni, Nicholas Jaco	10.7		-	Finalize responses to second set of interrogatories and requests for production; draft UG interrogatories to SunTrust; review document chronology in connection with same.
8/17/2010	13336	Bronni, Nicholas Jaco	8.2		-	Conference call concerning UGS contracts with SunTrust; review UGS contracts with SunTrust; draft letter to T. Sabalewski regarding UGS subpoena; draft discovery requests.
8/18/2010	13336	Bronni, Nicholas Jaco	7.9		-	Draft responses to SunTrust discovery requests; draft interrogatories to SunTrust; draft request for admissions to SunTrust.
8/19/2010	13336	Bronni, Nicholas Jaco	8.2		-	Revise interrogatories to SunTrust; draft request for admissions to SunTrust; review document chronology in connection with same.
8/20/2010	13336	Bronni, Nicholas Jaco	7.7		-	Draft request for admissions; draft further responses to SunTrust interrogatories; conference call with D. Hamilton regarding same; conference call with P. Gavin regarding same.
8/23/2010	13336	Bronni, Nicholas Jaco	7.9		-	Revise requests for admission; draft further responses to SunTrust interrogatories; call with P. Gavin regarding same; review D. Hershman expert report.
8/24/2010	13336	Bronni, Nicholas Jaco	7.9		-	Review filed sanctions motion in connection with discovery requests; review SunTrust privilege log; draft letter concerning same; review J. Caughey revisions to interrogatories; revise interrogatories in response to same.
8/25/2010	13336	Bronni, Nicholas Jaco	7.7		-	Revise request for admissions; conference call with J. Caughey regarding same; review UGC documents in connection with subpoena response.
8/26/2010	13336	Bronni, Nicholas Jaco	7.1		-	Review SunTrust privilege log in connection with drafting objections to same.
8/27/2010	13336	Bronni, Nicholas Jaco	6.8		-	Draft Second Request for Production of Documents; review SunTrust privilege log in connection with drafting objections to same.
8/30/2010	13336	Bronni, Nicholas Jaco	9.5		-	Review SunTrust privilege log in connection with drafting objections to same; draft letter regarding SunTrust privilege log deficiencies; meeting regarding second responses to SunTrust interrogatories; revise draft responses in response to same.
8/31/2010	13336	Bronni, Nicholas Jaco	7.8		-	Review UGC documents; coordinate UGC document production; draft letter to T. Sabalewski regarding same; revise SunTrust interrogatory responses.
9/1/2010	13336	Bronni, Nicholas Jaco	3.7		-	Review UGS documents; revise letter regarding SunTrust privilege log.
9/15/2010	13336	Bronni, Nicholas Jaco	5.1		-	Prepare for upcoming depositions; review UGS notice of deposition.
9/16/2010	13336	Bronni, Nicholas Jaco	8.3		-	Review D. Green documents in preparation for deposition; research regarding backup tape production standards; draft SunTrust 30(b)(6) notice.
9/17/2010	13336	Bronni, Nicholas Jaco	7.4		-	Review documents in preparation for upcoming depositions; revise SunTrust 30(b)(6) notice; coordinate upcoming depositions.
9/20/2010	13336	Bronni, Nicholas Jaco	8.8		-	Prepare for upcoming depositions; review SunTrust objections to RFAs; research regarding remedies for premium nonpayment; research backup tape production standards.
9/21/2010	13336	Bronni, Nicholas Jaco	8.9		-	Coordinate upcoming depositions; review, revise motion for extension; research regarding premium payments.
9/22/2010	13336	Bronni, Nicholas Jaco	10.8	2	990.00	Research regarding sanctions reply burdens; draft summary concerning same; research regarding premiums summary judgment brief; draft premiums summary judgment brief.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
9/23/2010	13336	Bronni, Nicholas Jaco	8.4		-	Research regarding premiums summary judgment brief; draft premiums summary judgment brief.
9/24/2010	13336	Bronni, Nicholas Jaco	6.8		-	Research regarding premiums summary judgment brief; draft premiums summary judgment brief.
9/26/2010	13336	Bronni, Nicholas Jaco	3.1		-	Research concerning motion to quash UGS subpoena; draft brief in support of motion to quash UGS subpoena.
9/27/2010	13336	Bronni, Nicholas Jaco	8.6		-	Review documents for J. Bryant 30(b)(6) deposition; coordinate UGS deposition; research regarding motion to quash UGS subpoena; draft brief in support of motion to quash UGS subpoena; draft J. Bryant deposition preparation outline.
9/28/2010	13336	Bronni, Nicholas Jaco	1.8		-	Research regarding summary judgment brief.
9/29/2010	13336	Bronni, Nicholas Jaco	8.3		-	Review SunTrust responses to RFAs; revise summary judgment motion brief in response to same; draft letter concerning UGS document production; review UGS document production.
9/30/2010	13336	Bronni, Nicholas Jaco	6.6		-	Revise summary judgment brief in response to comments from J. Millian; research regarding same; review sanctions motion; draft statement of undisputed material facts.
10/1/2010	13336	Bronni, Nicholas Jaco	6.1		-	Research regarding premiums summary judgment motion; draft summary concerning same; revise motion in response to same; review C. Brennan revisions to same; draft proposed summary judgment order.
10/3/2010	13336	Bronni, Nicholas Jaco	4.6		-	Revise proposed summary judgment order; draft summary judgment motion; research regarding summary judgment brief.
10/4/2010	13336	Bronni, Nicholas Jaco	4.7		-	Review, revise summary judgment brief; review expert reports in connection with Daubert motions.
10/5/2010	13336	Bronni, Nicholas Jaco	8.5		-	Review R. Smith expert reports; review A. Gron expert report; review R. Smith deposition transcript; draft deposition digest concerning same.
10/6/2010	13336	Bronni, Nicholas Jaco	8.5		-	Research concerning R. Smith Daubert motion; review filed premiums summary judgment motion.
10/7/2010	13336	Bronni, Nicholas Jaco	9.7		-	Research concerning R. Smith Daubert motion.
10/8/2010	13336	Bronni, Nicholas Jaco	9.8		-	Research concerning R. Smith Daubert motion; draft same.
10/11/2010	13336	Bronni, Nicholas Jaco	9.8		-	Draft R. Smith Daubert motion; research concerning response to SunTrust summary judgment motion.
10/12/2010	13336	Bronni, Nicholas Jaco	9.8		-	Draft R. Smith Daubert motion; research concerning response to SunTrust summary judgment motion.
10/13/2010	13336	Bronni, Nicholas Jaco	10.2		-	Revise R. Smith Daubert brief draft; research concerning motion in limine regarding parent company references; review SunTrust summary judgment brief.
10/14/2010	13336	Bronni, Nicholas Jaco	9.7		-	Revise R. Smith Daubert brief; draft memorandum in support of motion in limine regarding parent company name; draft brief in support of motion in limine regarding settlement discussions; research regarding same.
10/15/2010	13336	Bronni, Nicholas Jaco	9.8		-	parent company name; draft brief in support of motion in limine regarding settlement discussions; research regarding same.
10/17/2010	13336	Bronni, Nicholas Jaco	7.1		-	Draft reply to SunTrust opposition to summary judgment on premiums; research regarding same.
10/18/2010	13336	Bronni, Nicholas Jaco	11.1		-	Revise, finalize R. Smith Daubert brief and supporting documents; revise, finalize motions in limine; draft reply SunTrust opposition to summary judgment on premiums.
10/19/2010	13336	Bronni, Nicholas Jaco	8.3		-	Revise reply SunTrust opposition to summary judgment on premiums; research concerning same; review SunTrust response to motion for summary judgment on Count I.
10/20/2010	13336	Bronni, Nicholas Jaco	6.3		-	Review A. Gron deposition transcript; research concerning reply to SunTrust opposition to motion for summary judgment.
10/21/2010	13336	Bronni, Nicholas Jaco	5.4		-	Draft A. Gron deposition digest; research concerning A. Gron Daubert motion response.
10/22/2010	13336	Bronni, Nicholas Jaco	3.6		-	Draft A. Gron deposition digest; Conference call with SSA regarding matter.
10/25/2010	13336	Bronni, Nicholas Jaco	6		-	Draft A. Gron Daubert motion response.
10/26/2010	13336	Bronni, Nicholas Jaco	4.8		-	Draft A. Gron Daubert motion response; research concerning same.
10/27/2010	13336	Bronni, Nicholas Jaco	7.1		-	Revise A. Gron Daubert response; research concerning sanctions hearing; review pleadings in connection with upcoming sanctions trial.
10/28/2010	13336	Bronni, Nicholas Jaco	7.8	7.8	3,861.00	Researching concerning sanctions hearing; draft memorandum concerning same; review pleadings in connection with upcoming sanctions trial.
10/29/2010	13336	Bronni, Nicholas Jaco	5.1		-	Review pleadings in connection with upcoming sanctions trial; revise A. Gron response.
11/1/2010	13336	Bronni, Nicholas Jaco	4.3	4.3	2,128.50	Review pleadings in connection with sanctions trial; research concerning potential confrontation clause arguments.
11/5/2010	13336	Bronni, Nicholas Jaco	0.5	0.5	247.50	Research concerning supplemental sanctions brief.
11/9/2010	13336	Bronni, Nicholas Jaco	6.3	6.3	3,118.50	Research concerning supplemental sanctions brief; meet with C. Brennan and B. Baldrate regarding same.
11/10/2010	13336	Bronni, Nicholas Jaco	6.4	6.4	3,168.00	Research concerning supplemental sanctions brief.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
11/11/2010	13336	Bronni, Nicholas Jaco	9.2	9.2	4,554.00	Research concerning supplemental sanctions brief; draft burden shifting section of supplemental sanctions brief.
11/12/2010	13336	Bronni, Nicholas Jaco	6	6	2,970.00	Research concerning supplemental sanctions brief; draft section of brief concerning subornation of perjury and obstruction of justice.
11/15/2010	13336	Bronni, Nicholas Jaco	0.5	0.5	247.50	Research concerning supplemental sanctions brief.
11/16/2010	13336	Bronni, Nicholas Jaco	0.5	0.5	247.50	Research concerning supplemental sanctions brief.
11/17/2010	13336	Bronni, Nicholas Jaco	0.4	-	-	Verify UGRICNC interrogatory responses.
11/18/2010	13336	Bronni, Nicholas Jaco	4.9	4.9	2,425.50	Research concerning supplemental sanctions brief.
11/8/2010	16418	Burroughs, Trevor L.	1	-	-	Meet with J. Caughey to discuss case issues and projects.
11/9/2010	16418	Burroughs, Trevor L.	1.3	-	-	Attend training on Discovery Radar product.
11/10/2010	16418	Burroughs, Trevor L.	0.2	-	-	Discuss production specifications for documents being reviewed.
11/11/2010	16418	Burroughs, Trevor L.	1.5	-	-	Search for documents produced by plaintiffs for J. Caughey
11/12/2010	16418	Burroughs, Trevor L.	2	-	-	Search for original versions of documents produced by plaintiffs for J. Caughey.
11/15/2010	16418	Burroughs, Trevor L.	1.3	-	-	Coordinate processing and distribution of new documents for review by contract attorneys with vendor and J. Caughey.
11/16/2010	16418	Burroughs, Trevor L.	0.3	-	-	E-mails with vendor to discuss passing out documents for contract attorneys to review.
11/19/2010	16418	Burroughs, Trevor L.	1.3	-	-	Create production disc of documents received from client for J. Caughey; Phone call with J. Caughey and M. Flannigan to discuss production
11/23/2010	16418	Burroughs, Trevor L.	0.8	-	-	Create new production disc with current date for J. Caughey; Look up custodian informaion in online database for J. Caughey.
11/29/2010	16418	Burroughs, Trevor L.	0.5	-	-	Research questions about plaintiff productions being loaded into online database for J. Caughey.
12/1/2010	16418	Burroughs, Trevor L.	0.5	-	-	Download documents from vendor and send to J. Caughey; Coordinate production of documents with vendor.
12/3/2010	16418	Burroughs, Trevor L.	0.3	-	-	Work on downloading production from vendor.
12/6/2010	16418	Burroughs, Trevor L.	0.5	-	-	Work with vendor to have documents searched and batched for review and possible production.
12/9/2010	16418	Burroughs, Trevor L.	0.3	-	-	E-mails and phone calls about production for tomorrow.
12/10/2010	16418	Burroughs, Trevor L.	2.3	-	-	conference call with vendor; Create production CD for J. Caughey.
12/14/2010	16418	Burroughs, Trevor L.	0.3	-	-	Copy hard drive received from J. Caughey.
12/20/2010	16418	Burroughs, Trevor L.	0.3	-	-	E-mails and phone calls with team about searching documents in online database.
1/4/2011	16418	Burroughs, Trevor L.	0.5	-	-	Copy hard drives from client to new hard drives for J. Caughey.
11/5/2010	14320	Callahan, Thomas J	1.6	-	-	Go through binders containing information on 188 claims and list all United Guaranty employees mentioned in correspondence for M. Flanagan.
11/18/2010	14320	Callahan, Thomas J	1.4	-	-	Search through binders containing all 188 claims and create list of claims that were denied based on noncompliance with "agreed upon guidelines" for M. Flanagan.
12/1/2010	14320	Callahan, Thomas J	1.6	-	-	Add new documents to AIG claim binders for M. Flanagan; create list of claims that did not have any new documents.
12/18/2009	14025	Caughey, Jennifer V.	10.1	5	2,450.00	Complete review and compilation of responsive hard copy documents; research spoliation, preservation, expedited discovery and Rule 11 in preparation for motion regarding the February 2008 email and spoliation.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
12/21/2009	14025	Caughey, Jennifer V.	12.2	6	2,940.00	Draft memorandum in support of United Guaranty's opposition to SunTrust's Motion to Compel; research legal requirements for temporary restraining orders and Fed. R. Civ. P. 65; research temporary restraining orders and their application in cases with concerns about spoliation of evidence; revise and review memorandum in opposition to SunTrust's Motion to Compel.
12/22/2009	14025	Caughey, Jennifer V.	9.1	5	2,450.00	Draft, review and revise Memorandum in Opposition to Motion to Compel; research cases regarding discovery matters to use in and shape the Opposition to Motion to Compel; research preliminary injunctions and acquire and review treatise sections on Fed. R. Civ. P. 65; research cases in which courts have acted under inherent power, especially when there was an incident of fraud upon the court.
12/28/2009	14025	Caughey, Jennifer V.	8.9	4	1,960.00	Review emails sent by SunTrust to United Guaranty; review privileged documents for purposes of creating privilege log; prepare hard copy documents for production; review case binder for memorandum in support of emergency relief; research federal rules and dates to determine when SunTrust's response is due; prepare search terms for electronic production; draft motion in conjunction with privilege log; edit case names in memorandum in support of emergency relief.
12/29/2009	14025	Caughey, Jennifer V.	8.8	0.5	245.00	Send disk containing P. Gavin files via overnight mail to KPMG so that KPMG can extract files from disk and integrate those files with other files for electronic discovery purposes; communicate with KPMG about electronic discovery and integration of files in Gavin disk; revise search terms for electronic production; communicate with KPMG regarding search terms and inquire into how many documents search terms produce; prepare hard-copy documents for production; create index of United Guaranty production concerning custodian, date produced, and Bates numbering; update cover letter for document production; create term list for sorting privilege documents; teleconference with KPMG personnel regarding search terms and electronic discovery; teleconference with B. Baldrate and C. Brennan regarding the 12/29/09 hearing and the status of the case.
12/30/2009	14025	Caughey, Jennifer V.	10.2	1	490.00	Summarize interview responses from United Guaranty personnel and detail what documents each person has and where the documents are located, including S, C, and U drives; create spreadsheet with document data; obtain disk from SunTrust with PrivilegeLog; review contents of disk; review documents flagged as privileged to assess what is in them and whether United Guaranty should produce them; contact KPMG personnel regarding Pam Gavin's computer imaging; confer with C. Brennan regarding search terms for electronic production; compile and prepare documents to review to make final determination as to search terms for electronic discovery purposes; review transcript of 12/29/2009 hearing.
1/5/2010	14025	Caughey, Jennifer V.	11.7	0.5	222.50	Review and revise document describing UG-ST matter to provide to contract attorneys to prepare them for electronic discovery; review Bates stamped documents in preparation for producing them today; finalize cover letter to accompany hard copy document production; draft letter to SunTrust explaining United Guaranty's production regarding the Court's December 2009 order and the February 22, 2008 email; create list of important people for contract attorneys, update and prepare document relevance list for contract attorneys; prepare privilege log.
1/11/2010	14025	Caughey, Jennifer V.	11.1	0.5	222.50	Work with copy center to prepare claims files for production; teleconference with KPMG regarding production; supervise contract attorneys and answer their questions; review and revise privilege log; confer with B. Baldrate and C. Brennan about the privilege log, the contract attorneys, and the status of the case; edit proposed order regarding imaging of Mary Pettitt's computer.
1/29/2010	14025	Caughey, Jennifer V.	8.6	7.5	3,337.50	Research, draft, review and revise subpoena duces tucem as well as accompanying attachment and notice; review documents marked as privileged by contract attorneys for second level review and to add descriptions for privilege log; confer with B. Baldrate and C. Brennan about subpoena duces tucem; confer with B. Gorman about privilege review and log.
2/3/2010	14025	Caughey, Jennifer V.	10.2	6	2,670.00	Supervise contract attorneys and answer their questions; complete review of documents flagged as privileged and add descriptions; confer with B. Baldrate and C. Brennan about the status of the case; review SunTrust filing in response to United Guaranty's motion for emergency relief; prepare spreadsheet summarizing United Guaranty and SunTrust production facts; locate potential e-mails that Mary Pettitt may have tampered.
2/6/2010	14025	Caughey, Jennifer V.	4.1	4.1	1,824.50	Review and compile documents for Pettitt deposition; review SunTrust's privilege log for potential leads for Pettitt deposition; create an excerpt of SunTrust's privilege log containing all entries for which Mary Pettitt is the document custodian; create an excerpt of SunTrust's privilege log containing all entries for which Mary Pettitt is the document custodian and the document is dated 2008 or 2009; highlight in that excerpt all entries that are relevant or important to this case and the Pettitt deposition; create one more excerpt of SunTrust's privilege log containing only entries that appear to be important or related to this case and for which Mary Pettitt is the document custodian and the document is dated 2008 or 2009.
2/7/2010	14025	Caughey, Jennifer V.	3.7	3.7	1,646.50	Review and compile documents for Pettitt deposition from all hard copy documents and from documents flagged as important by our contract attorneys; review SunTrust documents containing the word "litigant!" in preparation for Pettitt's deposition.



Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
2/8/2010	14025	Caughey, Jennifer V.	9.8	9.8	4,361.00	Review and compile documents for Pettitt deposition; prepare and organize documents; create and revise index for each set of documents; supervise contract attorneys and answer contract attorney questions; create excerpt of SunTrust's privilege log containing all relevant or important entries for which Mary Pettitt is the document custodian and the document is dated between May of 2008 and August 14, 2008 (two days after we believe the tampering occurred).
2/9/2010	14025	Caughey, Jennifer V.	11.2	11.2	4,984.00	(Spoliation) Review, prepare and organize documents for Pettitt deposition; research law on depositions, motions to quash, and the Fifth Amendment, searching in particular for law that states that a deponent's intention to assert his or her Fifth Amendment privilege does not excuse the deponent from attending the deposition; review SunTrust privilege log document entries in preparation for Pettitt deposition.
2/10/2010	14025	Caughey, Jennifer V.	6.5	6.5	2,892.50	(Spoliation) Review, prepare, and organize documents for Pettitt deposition; confer with B. Baldrate and C. Brennan about those documents; update index for Pettitt deposition exhibits; confer with A. Lesch regarding locating key documents in preparation for spoliation depositions; research waiver of privilege law in preparation for issues surrounding deposition.
2/11/2010	14025	Caughey, Jennifer V.	11.1	11.1	4,939.50	(Spoliation) Prepare for Pettitt deposition; compile, review, organize and prepare documents and exhibits concerning spoliation depositions; create excerpted log from SunTrust's privilege logs with all entries SunTrust identified as concerning the tampered emails in preparation for M. Pettitt deposition; confer with C. Brennan and B. Baldrate about deposition preparations; review documents produced by SunTrust for additional tampering by Mary Pettitt; confer with A. Lesch about locating documents in preparation for Pettitt deposition.
2/12/2010	14025	Caughey, Jennifer V.	0.2	0.2	89.00	(Spoliation) Review transcript from M. Pettitt deposition.
2/15/2010	14025	Caughey, Jennifer V.	4.8	4.8	2,136.00	(Spoliation) Review, compile, and prepare additional documents for Clack and Thurman depositions; prepare exhibits.
2/16/2010	14025	Caughey, Jennifer V.	2.8	2.8	1,246.00	(Spoliation) Review documents from SunTrust's production looking for documents that could be the third email tampered by Mary Pettitt; work with A. Lesch regarding the search for that tampered email; search SunTrust's production for that tampered email using targeted search terms based on the as sent version of the email; review the documents located in the searches and discuss them with C. Brennan and B. Baldrate; prepare an excerpt of SunTrust's privilege logs highlighting all entries concerning that third altered document.
2/17/2010	14025	Caughey, Jennifer V.	0.2	0.2	89.00	(Spoliation) Begin preparing spoliation timeline.
2/18/2010	14025	Caughey, Jennifer V.	12.2	12.2	5,429.00	(Spoliation) Create detailed timeline with references for the spoliation issue; review documents for purposes of creating timeline for the spoliation issue; review and revise timeline for spoliation issue; confer with B. Baldrate and C. Brennan regarding the spoliation timeline.
2/19/2010	14025	Caughey, Jennifer V.	8.9	8.9	3,960.50	(Spoliation) Update, review, revise and finalize timeline for spoliation issue; draft introduction section to memorandum in support of motion responding to SunTrust's February 16 Motion; review and revise introduction to memorandum; confer with B. Baldrate regarding SunTrust's waiver argument concerning M. Pettitt and draft language regarding that argument; draft motion to compel to accompany our memorandum laying out our requested relief.
2/22/2010	14025	Caughey, Jennifer V.	7.1	7.1	3,159.50	(Spoliation) Review, prepare and compile exhibits for the response motion to be filed today; review the related Motion to Compel; review Thurman and Clack depositions for additional references supporting SunTrust's effort to block testimony, especially when SunTrust has made a related representation; review references from the January 8, 2010 status conference in the draft Motion for purposes of preparing the related exhibit; review and revise the draft motion.
2/23/2010	14025	Caughey, Jennifer V.	0.3	0.3	133.50	(Spoliation) Search clawed back documents for potential tampering by Pettitt.
2/24/2010	14025	Caughey, Jennifer V.	8.7	8.7	3,871.50	(Spoliation) Review clawed back document that relates to spoliation issue (specifically that includes e-mail exchange containing Pettitt's reference to the tampered 2/22/2008 e-mail) and search for all documents related to or referenced in that document; confer with B. Baldrate and C. Brennan regarding that document; prepare binder for J. Millian as well as index and notes concerning documents referenced in that important clawed back document; review privilege logs and production letters searching for references to S. Thurman; confer with A. Lesch about metadata for tampered e-mails.
2/25/2010	14025	Caughey, Jennifer V.	11.8	11.8	5,251.00	(Spoliation) Compile and prepare summary of metadata on 2/1/2006 e-mail and on 6/20/2005 e-mail; review SunTrust privilege logs searching for references to outside counsel to discern who knew about the spoliation and when they learned about it; prepare courtesy copies of our recent motions and exhibits on the spoliation issue for the Court; finalize preparation of binder for J. Millian regarding important clawed back document that relates to spoliation issue; draft facts section of spoliation memorandum; review and revise facts section for spoliation memorandum.
2/26/2010	14025	Caughey, Jennifer V.	2.7	2.7	1,201.50	(Spoliation) Complete, review and revise facts section of spoliation memorandum; confer with A. Lesch and V. Bratcher about searching for any inadvertently produced copies of documents referred to in entries on SunTrust's privilege log concerning the February 22, 2008 tampered e-mail; review documents produced by Pettitt in response to United Guaranty's subpoena.
3/2/2010	14025	Caughey, Jennifer V.	2.3	2.3	1,023.50	(Spoliation) Review SunTrust's 3/1/2010 filing; research in preparation for and then create, review and revise chart summarizing information regarding documents submitted by SunTrust for in camera review, including SunTrust's privilege logs and Exhibit C to SunTrust's 3/1/2010 filing.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
3/3/2010	14025	Caughey, Jennifer V.	1.1	1.1	489.50	(Spoliation) Compare SunTrust's revised 2/22/2008 privilege log to its initial 2/22/2008 privilege log and summarize distinctions; compile notes on interrogatories and consider depositions we might request on spoliation issue.
3/4/2010	14025	Caughey, Jennifer V.	4.3	4.3	1,913.50	(Spoliation) Prepare for discussion our current knowledge of the metadata on Pettitt's tampered emails, compiling all of the data we have, determining how we know certain facts, and looking into the reason we do not know other facts; confer with A. Lesch regarding this metadata; draft list of what interrogatories, depositions, and questions we might ideally want to ask or request regarding the spoliation issue; confer with J. Millian, C. Brennan, B. Baldrate and N. Adams regarding this metadata, the list of potential interrogatories and questions, and upcoming motions.
3/6/2010	14025	Caughey, Jennifer V.	1.9	1.9	845.50	(Spoliation) Review, revise and update spoliation timeline.
3/7/2010	14025	Caughey, Jennifer V.	2.1	2.1	934.50	(Spoliation) Review, revise and update spoliation timeline.
3/8/2010	14025	Caughey, Jennifer V.	2.9	2.9	1,290.50	(Spoliation) Work with A. Lesch to search for documents inadvertently produced by SunTrust, looking for spoliation information; review search results and conduct follow up searches in discovery radar; review documents that A. Lesch pulled as potentially similar to the documents on SunTrust's revised privilege log related to the 2/22/08 email; verify that none of these documents were clawed back by SunTrust; compare documents to the entries on SunTrust's privilege log; draft email to J. Millian regarding these documents.
3/9/2010	14025	Caughey, Jennifer V.	2.6	2.6	1,157.00	(Spoliation) Review documents and attachments produced by searches for spoliation-related information run by A. Lesch; continue to search for attachments and related documents; finalize email to J. Millian regarding results of these searches.
3/11/2010	14025	Caughey, Jennifer V.	8.2	4	1,780.00	Search for email described by Gavin in which Pettitt confirms guidelines are accurate; work with A. Lesch and KPMG regarding documents marked as the second most important by contract attorneys, including number of such documents and number containing certain names; prepare for J. Millian edited set of documents marked as most important by contract attorneys; prepare for J. Millian all documents produced by SunTrust that references Thurman; complete compilation of guidelines and emails transmitting guidelines from Gavin to SunTrust; review and update case files.
3/12/2010	14025	Caughey, Jennifer V.	8.1	8.1	3,604.50	Prepare materials for J. Millian's review including documents marked as most important by contract attorneys and documents produced by SunTrust that reference "Thurman"; work with contract attorneys to organize documents in chronological order; review Pettitt documents produced by SunTrust on March 9, 2010.
3/15/2010	14025	Caughey, Jennifer V.	9.9	9.9	4,405.50	Work with contract attorneys to finalize documents references "Thurman;" search in United Guaranty's and SunTrust's productions for email mentioned by P. Gavin in deposition; search for emails from S. Huber to United Guaranty in December 2003 in preparation for call with P. Gavin; review documents and attachments that reference "Thurman," determine pertinent documents to provide to J. Millian; locate documents pertaining to and create detailed chronology regarding February 4, 2004 email and all related chains as well as all S. Huber 2003 emails; confer with contract attorneys and answer their questions.
3/16/2010	14025	Caughey, Jennifer V.	9.9	9.9	4,405.50	(Spoliation) Create exhibit to United Guaranty's reply to its Motion to Compel setting forth exactly United Guaranty requests in Motion to Compel, including a list of privilege numbers of documents sought; prepare footnote for brief addressing deficiencies in SunTrust's logs; draft and revise portions of chart for Reply on Motion to Compel explaining what documents SunTrust failed to produce, review and revise Reply to United Guaranty's Motion to compel.
3/17/2010	14025	Caughey, Jennifer V.	9.8	9.8	4,361.00	(Spoliation) Review and revise exhibit detailing United Guaranty's specific requests for Reply to Motion to Compel; review, verify, and revise transcript cites for Reply Memorandum; search United Guaranty's hard copy production from its central files for documents containing emails mentioned by P. Gavin in her deposition related to the spoliation issue; search discovery radar for documents containing emails mentioned by P. Gavin in her deposition related to the spoliation issue; prepare exhibit for Reply to Motion to Compel.
3/18/2010	14025	Caughey, Jennifer V.	6.1	6.1	2,714.50	(Spoliation) Search on discovery radar for documents described by P. Gavin in her deposition; compile located documents; search through A. Siesling hard-copy documents for document discussed by P. Gavin; prepare binders with all copies of documents relating to references by P. Gavin in her deposition, both in terms of produced and withheld documents, and from both United Guaranty and SunTrust's production.
3/19/2010	14025	Caughey, Jennifer V.	4.1	4.1	1,824.50	(Spoliation) Prepare and finalize binders with all versions of the 2/4/2004 email and its related chain overall that could relate to the reference by P. Gavin in her deposition; ensure that all duplicate copies of those emails are downloaded and printed with their family documents; organize materials in chronological order; search on discovery radar for copies of potential documents that P. Gavin could have been referencing.
3/21/2010	14025	Caughey, Jennifer V.	1.3	1.3	578.50	Review M. Pettitt documents from March 9, 2010 production; review documents on discovery radar that contain the terms "Pettitt" and "Gavin" and are marked as important (either most important or second most important) by the contract attorneys.
3/22/2010	14025	Caughey, Jennifer V.	1.2	1.2	534.00	Conduct preliminary searches based on SunTrust's 3/22/10 spoliation related requests to determine the number of documents produced by United Guaranty responsive to each of the requests, running various search terms on discovery radar; draft documents summarizing findings.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
3/23/2010	14025	Caughey, Jennifer V.	0.8	0.8	356.00	(Spoliation) Identify documents for summary of information re SunTrust's six requests laid out in its 3/22/10 letter re the spoliation issue, review SunTrust's requests in its 3/22/10 letter and SunTrust's initial requests for production of documents to determine whether the new requests were encompassed in SunTrust's earlier requests; assess extent to which documents responsive to SunTrust's new requests were located by United Guaranty's search terms.
3/24/2010	14025	Caughey, Jennifer V.	12.2	12.2	5,429.00	(Spoliation) Research in preparation for and draft document summarizing for each of SunTrust's six requests laid out in its 3/22/10 letter re the spoliation issue whether (1) SunTrust's initial document requests covered that request, (2) what our responses/objections were, (3) whether our search terms would have pulled such documents, (4) whether we instructed the contract attorneys to produce such documents, and (5) the number of such documents produced or withheld; compile binder for J. Millian with this data summary and all relevant documents including, our search terms; confer with C. Brennan and B. Baldrate re findings concerning this data summary and how to proceed.
3/25/2010	14025	Caughey, Jennifer V.	8.4	8.4	3,738.00	(Spoliation) Draft, review, revise and prepare document summarizing information re each of SunTrust's six requests in its 3/22/10 letter re the spoliation in preparation for 3/26/10 hearing on United Guaranty's Motion to Compel; compile important related attachments and prepare binder for J. Millian with all materials; locate, prepare and provide to J. Millian relevant documents dated January 2008-February 2008; locate 2/21/2008 email requested by J. Millian and provide with attachments in preparation for 3/26/10 hearing.
4/9/2010	14025	Caughey, Jennifer V.	9.8	2	890.00	Confer with K. Guillermo re KPMG's report detailing results of SunTrust's search terms to assess how to proceed review; confer with K. Guillermo re having KPMG locate emails between SunTrust and United Guaranty dated during the period of late 2003 through early 2005; confer with B. Baldrate and C. Brennan re KPMG's report for sampling of SunTrust search terms; confer with KPMG re exporting documents described in KPMG's report to contract attorneys for review; confer with KPMG re 2003-2005 to include in a chronology; search for versions of the February 1, 2006 email in SunTrust's December 23, 2009 production; draft, review and revise research summary for J. Millian on ethics research findings; confer with contract attorneys re meetings to discuss project details; compile and send SunTrust privilege logs and log summary to B. Baldrate and C. Brennan.
4/13/2010	14025	Caughey, Jennifer V.	2.6	2.6	1,157.00	Review SunTrust's revised privilege log concerning February 22, 2008 email; draft email re entries and discuss with C. Brennan; create spreadsheet containing all entries on SunTrust's Revised Privilege Log regarding February 22, 2008 email reference the draft letter, separating entries into categories; review J. Millian's draft letter to SunTrust regarding spoliation production; review proposed changes by W. Durette; review SunTrust's February 11, 2010 letter referencing privilege log entries concerning tampered emails to determine if they reference draft letter; cross-check privilege numbers referenced in SunTrust letter with those on SunTrust's revised privilege log; cross-check those privilege numbers against the ones in the Revised Privilege Log Regarding the February 22, 2008 email; review transcript from hearing to see what the Court said about Appendix B and the draft letter; email J. Millian the chart that I created.
4/19/2010	14025	Caughey, Jennifer V.	0.6	0.6	267.00	Spoliation: Review documents produced by SunTrust identified in SunTrust's April 13, 2010 letter.
4/20/2010	14025	Caughey, Jennifer V.	1.7	1.7	756.50	Spoliation: Communicate with K. Guillermo re SunTrust production documents; review documents in Exhibit A of SunTrust's 9th production.
4/21/2010	14025	Caughey, Jennifer V.	3.6	3.6	1,602.00	Confer with C. Brennan re tasks to complete; work with assistant to prepare and finalize Exhibit A documents from SunTrust's production; confer with B. Gorman re reviewing Appendix B to list documents not produced or produced in redacted form; confer with B. Gorman and K. Guillermo re documents cited in SunTrust's April 19, 2009 letter; review email from C. Brennan discussing interesting documents produced by SunTrust; review these and other SunTrust documents; confer with K. Guillermo re production of documents from SunTrust and missing attachments.
4/22/2010	14025	Caughey, Jennifer V.	0.5	0.5	222.50	Spoliation: Update binders concerning SunTrust's recent productions to include materials listed in SunTrust's Appendix A of its April 13, 2010 letter.
5/9/2010	14025	Caughey, Jennifer V.	2.6	2.6	1,157.00	Review updated report from KPMG; review, update and revise summary of interesting documents produced in SunTrust's April 23, 2010 production for status update; review and summarize information regarding SunTrust's privilege logs for its spoliation productions, including the number of log entries, the date range, the number of custodians, and the number of entries for each custodian.
5/11/2010	14025	Caughey, Jennifer V.	9.3	3	1,335.00	Review and revise compilation of documents SunTrust referenced as important; confer with contract attorneys re projects, questions they have and their findings; participate in call with KPMG re non-searchable documents; participate in call with KPMG and S. Millard re non-searchable documents; send compilation of documents to C. Brennan and B. Baldrate; confer with B. Baldrate and C. Brennan re SunTrust's spoliation production; search for genuine versions of the February 1, 2006 email being sent to SunTrust's outside counsel, searching metadata on KPMG's system and through binders; locate, compile, organize and prepare documents listed in Appendix A of our Status Update; confer with K. Guillermo re locating documents.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
5/12/2010	14025	Caughey, Jennifer V.	9.2	3	1,335.00	Review revised Appendix A to Status Update that includes pdf versions of all referenced documents compiled; review report from K. Guillermo and KPMG re non-searchable documents; confer with B. Baldrate and C. Brennan re non-searchable documents, documents labeled as important by SunTrust, claims file documents, and projects going forward; confer with contract attorneys and answer their questions; confer with Kelly law firm re the network and contract attorney problems with it; confer with K. Guillermo re KPMG and deduping of documents; review and organize all documents in SunTrust's STMC complete spoliation production.
5/19/2010	14025	Caughey, Jennifer V.	9.4	4	1,780.00	Prepare and compile documents that reference D. Hovatter or that come from D. Hovatter's custody for the Hovatter deposition, including documents from the STMC production and documents on KPMG's document review system; review all documents that contain the term "Hovatter" in document or metadata that our contract attorneys marked as key documents; identify documents for potential use as exhibits in Hovatter deposition; confer with B. Gorman re printing relevant D. Hovatter documents; confer with contract attorneys and answer their questions; discuss chronology and several questions re chronology with the contract attorney chronology team; search for certain documents from 2004 and 2005 and send located documents to C. Brennan and B. Baldrate; review Requests for Admissions from SunTrust; review related documents to assess how to object to SunTrust's Requests for Admissions; draft objections to SunTrust's Requests for Admissions.
5/21/2010	14025	Caughey, Jennifer V.	9.2	2	890.00	Draft, review and revise objections and responses to SunTrust's Requests for Admissions; confer with B. Baldrate re responses to Requests for Admissions; confer with KPMG and K. Guillermo re R. Hughes email from May 12, 2004 that we have not located in our production but that exists in SunTrust's production; confer with L. Ertel re nsf files for R. Hughes; confer with L. Ertel and C. Herrin re nsf files, archives, and pre and post October 2004; confer with B. Baldrate re R. Hughes email and conversations with L. Ertel and with L. Ertel and C. Herrin; review and revise subpoena to Anderson Kill's J. Gold; send W. Durette working draft chronology; prepare for W. Durette deduped spoliation production binder; email B. Baldrate and C. Brennan re findings re R. Hughes May 12, 2004 email; review documents included in date filter search that were withheld as non-responsive and mark for production where applicable.
5/24/2010	14025	Caughey, Jennifer V.	0.1	0.1	44.50	Create STMC deduped binder for R. Mastro.
5/25/2010	14025	Caughey, Jennifer V.	3.9	3.9	1,735.50	Locate, compile, and prepare documents for S. Thurman and J. Clack Depositions; draft, review and revise Notice of Deposition for S. Thurman and J. Clack, confer with C. Brennan and B. Baldrate re Notice of Depositions; send Notices of Depositions to W. Durette.
5/26/2010	14025	Caughey, Jennifer V.	4.4	4.4	1,958.00	Compile and prepare documents for S. Thurman and J. Clack depositions.
5/27/2010	14025	Caughey, Jennifer V.	5.5	5.5	2,447.50	Confer with C. Brennan and B. Baldrate re deposition preparation; complete preparation of documents for S. Thurman and J. Clack depositions; review Local Rules in the S.D.N.Y. and research case law re serving Subpoena Duces Tecum on J. Gold; search SunTrust's privilege logs re D. Hovatter; review Subpoena Duces Tecum for J. Gold, prepare exhibits, and coordinate sending.
5/28/2010	14025	Caughey, Jennifer V.	2.1	2.1	934.50	Confer with R. Mastro's assistant re service of J. Gold Subpoena; research for and draft Subpoena and Attachment to M. Dumville; confer with C. Brennan re Subpoena to M. Dumville; review S. Thurman and D. Hovatter documents produced by SunTrust.
5/31/2010	14025	Caughey, Jennifer V.	1.9	1.9	845.50	Review typed version of S. Thurman notes and make corrections; review deduped STMC production in preparation for S. Edmonds deposition.
6/1/2010	14025	Caughey, Jennifer V.	6.4	6.4	2,848.00	Review and prepare S. Thurman notes for S. Thurman deposition; review SunTrust's privilege logs re D. Hovatter; prepare for S. Thurman and J. Clack depositions, including organizing documents and boxes and updating potential exhibit list; confer with B. Baldrate re S. Thurman and J. Clack depositions.
6/2/2010	14025	Caughey, Jennifer V.	3.1	3.1	1,379.50	Confer with B. Baldrate re deposition documents, locate documents, and send documents to K. Moran; confer with B. Baldrate re S. Thurman deposition and re preparations for J. Clack deposition; search for copies of the genuine June 20, 2005 email in SunTrust's production in preparation for the J. Clack deposition, review metadata of those documents, and send the documents to B. Baldrate; review D. Hovatter deposition transcript.
6/3/2010	14025	Caughey, Jennifer V.	1.1	1.1	489.50	Conduct additional searches for June 20, 2005 emails and metadata and review findings; send email to B. Baldrate discussing those findings; search for documents for J. Clack deposition and send them to B. Baldrate.
6/8/2010	14025	Caughey, Jennifer V.	4.9	4.9	2,180.50	Confer with C. Brennan and B. Baldrate re documents to provide to T. Dupree and R. Mastro and spoliation motion outline; draft index for documents to provide to T. Dupree and R. Mastro; begin collecting those documents; review and update index of spoliation deposition exhibits; review J. Clack deposition transcript; begin reviewing S. Thurman deposition transcript.
6/9/2010	14025	Caughey, Jennifer V.	8.3	8.3	3,693.50	Review and revise index of spoliation materials; review materials in preparation for drafting spoliation motion outline; commence drafting sanctions motion outline.
6/10/2010	14025	Caughey, Jennifer V.	9.4	9.4	4,183.00	Review and revise index re spoliation documents; locate, compile and prepare spoliation documents; draft sanctions motion outline; confer with B. Baldrate and C. Brennan re the previous items.
6/11/2010	14025	Caughey, Jennifer V.	6.8	6.8	3,026.00	Prepare and finalize binders of spoliation documents; draft, review, and revise outline for sanctions motion.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
6/12/2010	14025	Caughey, Jennifer V.	2.9	2.9	1,290.50	Draft, review and revise sanctions motion outline; review J. Millian's memorandum describing applicable law re sanctions.
6/13/2010	14025	Caughey, Jennifer V.	9.3	9.3	4,138.50	Review and revise sanctions motion outline; confer with B. Baldrate re sanctions motion outline; review transcripts of both of Thurman's and both of Clack's depositions and excerpt important language in preparation for sanctions motion; review those deposition excerpts.
6/14/2010	14025	Caughey, Jennifer V.	2.4		-	Prepare email to C. Brennan and B. Baldrate re KPMG status; confer with K. Guillermo re UG share drives, non-searchable pdfs, and L. Sweeney documents; review and file Answer to Third Amended Complaint; confer with contract attorneys and answer their questions; confer with KPMG re batching of documents; confer with A. Lucas re premiums and ripeness issue.
6/14/2010	14025	Caughey, Jennifer V.	10.2	10.2	4,539.00	Spoliation: Review and revise outline for Sanctions Motion; review, revise, and finalize deposition excerpts from Thurman and Clack's depositions, updating them based on errata sheets; prepare for drafting Sanctions Motion, reviewing case law and key materials.
6/15/2010	14025	Caughey, Jennifer V.	0.9		-	Confer with B. Baldrate and A. Lucas re premiums issue and ripeness; confer with K. Guillermo re SunTrust productions.
6/15/2010	14025	Caughey, Jennifer V.	13.8	13.8	6,141.00	Spoliation: Draft Sanctions Motion; confer with B. Baldrate, T. Dupree, and R. Mastro re Sanctions Motion; review materials including deposition transcripts, documents, and cases that will be referenced in the Sanctions Motion.
6/16/2010	14025	Caughey, Jennifer V.	0.2		-	Confer with K. Guillermo and IT department re SunTrust productions; confer with B. Baldrate re requests for admissions.
6/16/2010	14025	Caughey, Jennifer V.	13.5	13.5	6,007.50	Spoliation: Draft, review and revise Sanctions Motion; review cases, testimony, and documents that will be referenced in the Sanctions Motion.
6/17/2010	14025	Caughey, Jennifer V.	0.3		-	Confer with K. Guillermo and IT department re SunTrust productions; confer with contract attorneys and KPMG re review of SunTrust documents.
6/17/2010	14025	Caughey, Jennifer V.	7.6	7.6	3,382.00	Spoliation: Review deposition testimony excerpts and group them into themes; draft, review and revise Sanctions Motion; confer with B. Baldrate and C. Brennan re draft Sanctions Motion.
6/18/2010	14025	Caughey, Jennifer V.	0.4		-	Confer with contract attorneys and answer their questions; confer with K. Guillermo re claw back documents and recent productions.
6/18/2010	14025	Caughey, Jennifer V.	8.8	8.8	3,916.00	Spoliation: Prepare themed excerpts of deposition testimony; confer with B. Baldrate re Spoliation Motion; review M. Dumville production and email production to B. Baldrate, C. Brennan, J. Millian, R. Mastro and T. Dupree, detailing interesting documents; review documents to potentially reference in Sanctions Motion, including deposition exhibits, SunTrust's filings and SunTrust's, Anderson Kill & Olick's, and Reed Smith's productions.
6/19/2010	14025	Caughey, Jennifer V.	5.6	5.6	2,492.00	Review documents that we might reference in Sanctions Motion; review and revise Sanctions Motion, adding further support from the reviewed documents.
6/20/2010	14025	Caughey, Jennifer V.	8.1	8.1	3,604.50	Spoliation: Add additional factual support to Sanctions Motion; review and revise Sanctions Motion.
6/21/2010	14025	Caughey, Jennifer V.	3.8		-	Confer with C. Brennan re ESI; compile and review ESI-related correspondence; prepare to respond to SunTrust's June 18, 2010 ESI correspondence and send brief response to B. Baldrate; review A. Lucas memo re premiums; ensure clawed back documents have been destroyed and correspond with Reed Smith confirming destruction; review SunTrust's recent production information and confer with K. Guillermo re the location of these documents; request passwords from T. Sabalewski.
6/21/2010	14025	Caughey, Jennifer V.	5.6	5.6	2,492.00	Spoliation: Confer with B. Baldrate re Sanctions Motion; confer with B. Gorman re Sanctions Motion exhibits; compile documents in preparation for J. Gold deposition; prepare exhibits to Sanctions Motion.
6/22/2010	14025	Caughey, Jennifer V.	0.2		-	Confer with KPMG re contract attorney progress; confer with contract attorneys; correspond with B. Baldrate and C. Brennan re contract attorney status.
6/22/2010	14025	Caughey, Jennifer V.	12.7	12.7	5,651.50	Spoliation: Review J. Gold's final production; prepare potential exhibits for J. Gold deposition; correspond with K. Guillermo re J. Gold documents; confer with Reed Smith re passwords for productions; review cases to cite in Sanctions Motion; prepare exhibits for Sanctions Motion; draft, review and revise Sanctions Motion.
6/23/2010	14025	Caughey, Jennifer V.	2.6		-	Prepare for meeting with C. Brennan and B. Baldrate re outstanding tasks and updates on the case; confer with B. Baldrate, C. Brennan and A. Lucas re premiums and ripeness; confer with contract attorneys and answer their questions; correspond with K. Guillermo re SunTrust's letter re metadata.
6/23/2010	14025	Caughey, Jennifer V.	7.8	7.8	3,471.00	Spoliation: Review and revise Sanctions Motion, prepare J. Gold potential deposition exhibits; update index for deposition exhibits and circulate to J. Millian; discuss J. Gold exhibits with B. Baldrate and C. Brennan; draft correspondence re SunTrust's claw back of STMC documents.
6/24/2010	14025	Caughey, Jennifer V.	0.4		-	Confer with contract attorneys; correspond with C. Brennan re contract attorney next project; confer with K. Guillermo re KPMG upload of documents.
6/24/2010	14025	Caughey, Jennifer V.	9.6	9.6	4,272.00	Spoliation: Prepare for J. Gold deposition; prepare exhibits for deposition; update deposition exhibit index; confer with C. Brennan and B. Baldrate re deposition preparations; review native files produced by J. Gold and Reed Smith; draft correspondence re timing of Sanctions Motion facts to B. Baldrate in response to questions from T. Dupree.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
6/25/2010	14025	Caughey, Jennifer V.	2.4		-	Review documents to potentially add to the chronology and mark them appropriately; confer with B. Baldrate and C. Brennan re outstanding tasks; review correspondence from KPMG and K. Guillermo; search for documents with "Kim" and "Corman" in our production and apply date range to those documents; conduct the same exercise with "Amber Siesling"; correspond with K. Guillermo re preparing documents for C. Brennan and B. Baldrate.
6/25/2010	14025	Caughey, Jennifer V.	6.8	6.8	3,026.00	Spoliation: Prepare for J. Gold deposition; prepare document organizing testimony from depositions by themes and circulate document; review S. Thurman deposition transcripts and select testimony that could be used in J. Gold deposition; create document that organizes that testimony by points on which J. Gold might contradict S. Thurman; locate documents for Sanctions Motion preparation; locate documents for J. Gold Deposition to add to potential exhibits.
6/26/2010	14025	Caughey, Jennifer V.	0.6	0.6	267.00	Spoliation: Review S. Thurman testimony to potentially use in J. Gold deposition.
6/27/2010	14025	Caughey, Jennifer V.	1.8		-	Review documents to potentially add to the chronology and mark them appropriately; coordinate with KPMG and K. Guillermo re batching of documents to our contract attorneys.
6/27/2010	14025	Caughey, Jennifer V.	1.6	1.6	712.00	Spoliation: Prepare document summarizing certain S. Thurman testimony to use in J. Gold deposition; review and revise S. Thurman testimony excerpts for J. Gold deposition; circulate document to J. Millian, B. Baldrate and C. Brennan.
6/28/2010	14025	Caughey, Jennifer V.	0.9		-	Correspond with contract attorneys re documents and review; confer with K. Guillermo re K. Corman, A. Siesling, and SunTrust's clawed back documents.
6/28/2010	14025	Caughey, Jennifer V.	9.7	9.7	4,316.50	Spoliation: Review potential exhibits in preparation for J. Gold deposition; participate in J. Gold deposition; draft Sanctions Motion timeline; confer with J. Millian, C. Brennan and B. Baldrate re Gold deposition.
6/29/2010	14025	Caughey, Jennifer V.	8.1		-	Review, analyze, and compile R. Hughes documents; confer with K. Guillermo re R. Hughes documents; review and analyze SunTrust's clawed back documents; draft summary of SunTrust's clawed back documents and circulate summary to C. Brennan and B. Baldrate; verify destruction of clawed back documents; correspond with Reed Smith regarding this destruction; review and analyze documents in preparation for S. Edmunds deposition.
6/29/2010	14025	Caughey, Jennifer V.	1.4	1.4	623.00	Spoliation: Review and revise timeline for Sanctions Motion and circulate to T. Dupree, C. Brennan and B. Baldrate; update Index of Deposition Exhibits.
6/30/2010	14025	Caughey, Jennifer V.	1.6		-	Correspond with contract attorneys re SunTrust documents and the chronology; confer with K. Guillermo re KPMG and contract attorney progress; confer with J. Dechert re contract attorney work plan; compile and review ESI-related correspondence.
6/30/2010	14025	Caughey, Jennifer V.	9.6	9.6	4,272.00	Spoliation: Review and analyze S. Edmunds and M. Pettitt documents; compile, select, and prepare potential exhibits for S. Edmunds deposition and M. Pettitt deposition; revise index of potential exhibits; review J. Gold deposition and select highlights; organize highlights by themes and circulate document.
7/1/2010	14025	Caughey, Jennifer V.	9.2	9.2	2,625.50	Review, analyze and prepare potential Edmunds deposition exhibits; review, analyze and prepare potential Pettitt deposition exhibits; review recent ESI correspondence and draft response to SunTrust's June 18, 2010 letter; confer with C. Brennan and B. Baldrate re draft response; review and revise draft response; confer with contract attorneys re review of SunTrust documents.
7/2/2010	14025	Caughey, Jennifer V.	9.2	6.8	2,236.61	Prepare potential deposition exhibits for S. Edmunds and M. Pettitt; review and analyze those documents; review previous deposition exhibits to determine which could be useful for the Pettitt deposition; confer with J. Millian, B. Baldrate and C. Brennan re Pettitt deposition; confer with contract attorneys re review progress; confer with K. Guillermo re recent ESI letters from SunTrust, review and analyze all recent ESI correspondence and prepare compilation; confer with personnel from the Kelly Law Firm re contract attorney work plan.
7/5/2010	14025	Caughey, Jennifer V.	8.3		-	Review and finalize exhibits for Edmunds deposition; compile SunTrust's privilege logs and ESI-related documents in preparation for ESI-related call; review, analyze and compile Pettitt deposition exhibits; compile Sanctions Motion exhibits and circulate to R. Mastro, J. Millian, T. Dupree, B. Baldrate and C. Brennan; confer with B. Baldrate re Pettitt deposition.
7/6/2010	14025	Caughey, Jennifer V.	13.5	6.8	1,524.21	Review, analyze, organize, and prepare M. Pettitt deposition exhibits; correspond with KPMG and K. Guillermo re potential M. Pettitt exhibits; correspond with B. Baldrate re Pettitt deposition and email that Pettitt potentially doctored; search for information re potentially doctored email including metadata; review and analyze potentially doctored email; confer with K. Guillermo re potentially doctored email; correspond with K. Guillermo re ESI issues; review and analyze ESI related communication and reports; draft summary of ESI outstanding items; confer with contract attorneys, discuss their review, and answer their questions; review and analyze non-searchable PDF sampling documents; review and analyze SunTrust's privilege logs looking for points to challenge.
7/7/2010	14025	Caughey, Jennifer V.	9.5	5.3	1,315.79	Search for, review, and analyze metadata and related information regarding the potentially doctored email; discuss the potentially doctored email with KPMG and K. Guillermo; discuss Pettitt deposition with B. Baldrate; draft, review, and revise language to potentially add to Sanctions Motion responding to questions from R. Mastro; review and analyze sample non-searchable PDF documents and assess whether we should OCR all such documents; discuss ESI related issues with C. Brennan; correspond with KPMG re SunTrust's June 24, 2010 letter re ESI concerns; assess and compile notable dates regarding the litigation; confer with contract attorneys and answer their questions.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
7/8/2010	14025	Caughey, Jennifer V.	11	4.6	856.02	Review, revise and circulate responses to questions posed by R. Mastro re Sanctions Motion; correspond with T. Dupree re the same and other aspects of the Sanctions Motion; confer with K. Guillermo and KPMG re potentially doctored email; correspond with C. Brennan, B. Baldrate and J. Millian re potentially doctored email; run searches for M. Pettitt emails in KPMG's document system; review Edmunds Deposition Transcript; confer with KPMG re ESI and supplemental production; draft summary of status re review of SunTrust documents, review of United Guaranty documents, and related projects; confer with C. Brennan, B. Baldrate and J. Millian re documents production, document review, and steps going forward.
7/9/2010	14025	Caughey, Jennifer V.	7.6	4.4	1,133.58	Review and analyze S. Edmunds deposition transcript and select highlights; review, revise and update themed deposition testimony compilation to include highlights from the J. Gold and S. Edmunds depositions; review and analyze documents that could potentially be doctored by Pettitt; correspond with KPMG re upcoming production and review, and re Sun Trust's proposed search terms; review and analyze report re SunTrust's proposed search terms; correspond with K. Guillermo re non-searchable documents and documents in KPMG's repository; confer with contract attorneys re upcoming review of SunTrust's proposed search term documents; answer contract attorney questions; create a single SunTrust privilege log compiling all entries.
7/10/2010	14025	Caughey, Jennifer V.	4.9	4.9	2,180.50	Review and analyze emails in SunTrust's production, focusing on emails sent by M. Pettitt between June and October 2008; flag interesting and potentially doctored emails; confer with K. Guillermo re investigating the potentially doctored email.
7/11/2010	14025	Caughey, Jennifer V.	5.5	5.5	2,447.50	Review and analyze emails in SunTrust's production including emails sent from M. Pettitt to C. Stumbo and emails containing the word "internal" near other key terms; select documents to add to our chronology and that could potentially be doctored; confer with K. Guillermo re investigation of potentially doctored email.
7/12/2010	14025	Caughey, Jennifer V.	11.1	1.4	78.58	Review and analyze potentially doctored emails; review and analyze Sanctions Motion and draft comments; circulate comments to B. Baldrate and C. Brennan; confer with KPMG and K. Guillermo re review of documents responsive to SunTrust's proposed search terms; correspond with contract attorneys re review of those documents; review and analyze non-searchable PDF sample documents to assess our position regarding these documents; confer with B. Baldrate and C. Brennan re non-searchable documents; confer with K. Guillermo re metadata questions and non-searchable documents; confer with C. Brennan re our productions; draft letter responding to SunTrust's June 24, 2010 letter criticizing our production.
7/13/2010	14025	Caughey, Jennifer V.	6.1		-	Draft, review and revise correspondence in response to SunTrust's June 24, 2010 letter; confer with T. Choe re details of that letter and questions concerning our productions that impact the letter; correspond with KPMG, K. Guillermo, C. Brennan and B. Baldrate re upcoming correspondence and productions; confer with contract attorneys and answer their questions.
7/13/2010	14025	Caughey, Jennifer V.	6.8	6.8	3,026.00	Draft, review and revise Statement of Facts to accompany Spoliation Motion; review and analyze potentially doctored emails; compile potential exhibits for Sanctions Motion.
7/14/2010	14025	Caughey, Jennifer V.	14.1	11	4,721.42	Draft, review and revise Statement of Facts to accompany Spoliation Motion; correspond with B. Baldrate and C. Brennan re Statement of Facts; correspond with K. Guillermo re potentially doctored emails; coordinate production of documents and review of documents responsive to SunTrust's proposed search terms; correspond with contract attorneys and answer their questions.
7/15/2010	14025	Caughey, Jennifer V.	11.3	10	4,292.48	Draft, review and revise Statement of Facts to accompany Spoliation Motion; draft, review and revise index to accompany Statement of Facts; confer with contract attorneys and answer their questions; correspond with K. Guillermo re productions.
7/16/2010	14025	Caughey, Jennifer V.	8.1	7.7	3,257.29	Research, review, and analyze information re doctored May 1, 2007 email; confer with K. Guillermo re doctored May 1, 2007 email metadata; draft summary of the same; participate in teleconference with KPMG re declaration to accompany Sanctions Motion; research notice requirements re subpoenas for potential spoliation deponents; update, review, and revise timeline to accompany Sanctions Motion; discuss Sanctions Motion with J. Millian, B. Baldrate and C. Brennan; discuss non-searchable PDF documents with J. Millian and C. Brennan; discuss non-searchable PDF documents with K. Guillermo; coordinate plan to review non-searchable PDFs.
7/17/2010	14025	Caughey, Jennifer V.	0.6	0.6	267.00	Review, analyze, and verify accuracy of Statement of Facts and update it accordingly.
7/18/2010	14025	Caughey, Jennifer V.	5.6	5.6	2,492.00	Review, analyze, and verify accuracy of Statement of Facts and update it accordingly.
7/19/2010	14025	Caughey, Jennifer V.	10.3	9.2	3,656.78	Coordinate the review of SunTrust's most recent production; confer with M. Mansinghan re privilege log research; correspond with personnel from Kelly Law Firm re contract attorney progress; review, analyze and revise timeline of SunTrust's fraud; review and revise Statement of Facts to accompany Sanctions Motion; review Pettitt emails and analyze them to assess if they are doctored; send correspondence to J. Millian re Pettitt's truncation of May 1, 2007 email.

Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
7/20/2010	14025	Caughey, Jennifer V.	10.9	9.7	3,841.29	Review and revise draft Motion for Sanctions; locate and input additional support in that draft Motion; review and revise timeline of SunTrust's fraud; review and revise Statement of Facts and update it to conform with the revised draft Motion for Sanctions; teleconference with P. Gavin re declaration; confer with C. Brennan re Motion for Sanctions and Statement of Facts; correspond with K. Guillermo re document review and upcoming tasks; confer with contract attorneys and answer their questions.
7/21/2010	14025	Caughey, Jennifer V.	11.1	11.1	4,939.50	Review, revise and update Statement of Facts; review correspondence from SunTrust re additional doctored emails; research and analyze those doctored emails; confer with C. Brennan re searching for potentially doctored emails; confer with J. Millian re the same; review memorandum prepared by K. Guillermo re potentially doctored emails; correspond with K. Guillermo re potentially doctored emails and her memorandum; search for, review, and analyze potentially doctored emails in SunTrust's productions.
7/22/2010	14025	Caughey, Jennifer V.	11.1	7.9	2,502.02	Continue to search for, review and analyze potentially doctored emails in SunTrust's production; research email believed to be doctored; circulate findings re doctored email to J. Millian, C. Brennan and B. Baldrate; correspond with C. Brennan and K. Guillermo re potentially doctored emails and next phase of review; review, compile and prepare potential deposition exhibits for M. Dumville deposition; confer with D. Packer, an expert on Fannie Mae's Desktop Underwriter; correspond with K. Guillermo re document review and production; correspond with contract attorneys and answer their questions.
7/23/2010	14025	Caughey, Jennifer V.	10.7	10.4	4,498.24	Select, review and prepare potential deposition exhibits for M. Dumville deposition; compile exhibits from previous spoliation depositions; teleconference with KPMG re declaration and doctored emails; correspond with contract attorneys and answer their questions; correspond with K. Guillermo re KPMG's document repository and our documents.
7/26/2010	14025	Caughey, Jennifer V.	9.8	8.4	3,204.00	Prepare potential exhibits for M. Dumville deposition; search for and analyze potentially altered documents; confer with C. Brennan re potentially altered documents; correspond with J. Millian re altered matrix; confer with C. Brennan and T. Keegan re KPMG declaration; research for, draft, review and revise template for KPMG declaration; research voluntary dismissal standards re United Guaranty's counterclaim; correspond with contract attorneys re review of additional United Guaranty documents responsive to SunTrust's proposed search terms.
7/27/2010	14025	Caughey, Jennifer V.	10.7	8.1	2,728.64	Conference call with J. Bryant re loan spreadsheet; confer with C. Brennan and J. Millian re RFAs; locate and review correspondence between P. Gavin and M. Pettitt dated November 2004 through June 2005; search for copies of a February 2005 email transmitting the Guidelines Matrices in our and SunTrust's productions; correspond with contract attorneys re review of documents responsive to SunTrust's search terms; review and analyze potentially doctored emails; confer with J. Millian and C. Brennan re doctored emails; draft electronic correspondence to T. Dupree and R. Mastro re additional doctored emails; correspond with T. Dupree re Sanctions Motion; prepare and finalize M. Dumville potential deposition exhibits.
7/28/2010	14025	Caughey, Jennifer V.	10	0.4	7.12	Finalize M. Dumville potential deposition exhibits; confer with K. Guillermo re potentially doctored emails; review correspondence from K. Guillermo re doctored emails; review and analyze SunTrust's requests in its subpoena to UGC; create chart summarizing SunTrust's subpoena to UGC, including whether its requests are encompassed by prior requests and whether our search terms would have covered the requests; confer with contract attorneys, discuss their review, and answer questions.
7/29/2010	14025	Caughey, Jennifer V.	9.4	1.8	153.38	Draft list of potentially doctored emails and provide that list to C. Brennan and B. Baldrate; review correspondence from J. Millian re M. Dumville deposition; update and revise Statement of Facts to include newly discovered altered documents; continue to review and analyze requests in subpoena to UGC; draft, review and revise chart summarizing SunTrust's subpoena to UGC; draft list of outstanding tasks for the contract attorneys, KPMG and K. Guillermo and provide that list to C. Brennan and B. Baldrate; correspond with KPMG re February 2005 transmission of the Guideline Matrices; correspond with contract attorneys re next week and review status; confer with K. Guillermo re outstanding tasks; review and analyze requests in subpoena to UGC; draft, review and revise chart summarizing SunTrust's subpoena to UGC.
7/30/2010	14025	Caughey, Jennifer V.	6.1	1.2	105.05	Compile and prepare Appendix to Sanctions Motion; review and analyze KPMG declaration and provide comments and edits to B. Baldrate and C. Brennan; review and analyze requests in subpoena to UGC; draft, review and revise chart summarizing SunTrust's subpoena to UGC; confer with contract attorneys and discuss upcoming projects; compile discovery correspondence between the parties and provide it to B. Baldrate and C. Brennan; prepare chart exhibits to responses to SunTrust's second set of Requests for Admissions.
8/9/2010	14025	Caughey, Jennifer V.	0	3.6	1,602.00	Confer with B. Gorman re Sanctions Motion; review and edit draft KPMG declaration; confer with T. Choe and K. Guillermo re KPMG declaration.



Date	Tk#	Name	Billed Hrs	Sanction Hrs	Sanction \$	Narrative
8/9/2010	14025	Caughey, Jennifer V.	10.4		-	Confer with C. Brennan re upcoming tasks; review and analyze SunTrust's Second Set of Document Requests and Interrogatories; draft proposal re response to the those Requests and Interrogatories identifying, for example, United Guaranty search terms that covered those requests; review correspondence re experts, subpoena, and scheduling; correspond with K. Guillermo re non-searchable PDF documents; correspond with contract attorneys and Kelly law firm re review; confer with C. Brennan and N. Bronni re SunTrust's document Requests and Interrogatories; correspond with KPMG re additional search terms and batching of documents; confer with B. Gorman re Sanctions Motion; review and edit draft KPMG declaration; confer with T. Choe and K. Guillermore KPMG declaration.
8/10/2010	14025	Caughey, Jennifer V.	11.3	8.2	2,647.95	Review, revise, and add support to Sanctions Motion; review and revise KPMG declaration; confer with T. Keegan and K. Guillermo re KPMG declaration; correspond with P. Gavin re altered matrix; confer with contract attorneys re review; confer with KPMG re outstanding tasks; review and analyze teleconference hearing transcript and letter from SunTrust and craft plan of how to proceed in response to SunTrust's letter; confer with C. Brennan re upcoming tasks; review information re settlement memorandum.
8/11/2010	14025	Caughey, Jennifer V.	11.1	10.7	4,589.91	Teleconference with P. Gavin re altered matrix; review and revise KPMG declaration; compile, review, and analyze exhibits in Sanctions Memorandum; review and revise Motion, Memorandum, and Order re filing a 48-page Memorandum in support of our Sanctions Motion; draft and prepare Exhibit to Memorandum in support of filing a 48-page Memorandum; teleconference with United Guaranty personnel re DU policies; review United Guaranty documents responsive to the term "MCL."
8/12/2010	14025	Caughey, Jennifer V.	11.8	11.6	5,074.51	Review and revise KPMG declaration; review and revise Memorandum in Support of Motion for Sanctions; confer with B. Baldrate and C. Brennan re same; confer with T. Keegan re KPMG declaration; review and revise Index to Exhibits to accompany Motion for Sanctions; confer with K. Guillermo re KPMG declaration; correspond with KPMG re document review.
8/13/2010	14025	Caughey, Jennifer V.	10.3	7.6	2,495.46	Review and revise KPMG declaration; correspond with T. Keegan re KPMG declaration; draft, review, and revise P. Gavin declaration; compile, review, and analyze exhibits to accompany P. Gavin declaration; compile, review, and analyze exhibits to accompany United Guaranty's Memorandum in Support of Sanctions Motion; review and analyze documents that SunTrust objected to United Guaranty filing publicly; confer with K. Guillermo and KPMG re non-searchable PDFs; review documents responsive to the term MCL; review and analyze documents clawed back by SunTrust.
8/14/2010	14025	Caughey, Jennifer V.	3.2	3.2	1,424.00	Review United Guaranty's Memorandum in support of Sanctions; prepare, review, and analyze exhibits to accompany United Guaranty's Memorandum in Support of Sanctions Motion.
8/15/2010	14025	Caughey, Jennifer V.	2.4	2.2	897.42	Prepare, review, and analyze exhibits to accompany United Guaranty's Memorandum in Support of Sanctions Motion; correspond with KPMG re production of documents; review and analyze documents marked inconsistently by contract attorneys.
8/16/2010	14025	Caughey, Jennifer V.	11.7	2.8	298.19	Review and revise Memorandum in Support of Sanctions Motion; review and prepare Sanctions Motion exhibits; compile, review and analyze materials re P. Gavin declaration; prepare supplemental production; draft and send correspondence to Reed Smith regarding that production; confer with P. Gavin, J. Millian, C. Brennan and B. Baldrate in preparation for P. Gavin deposition; review and revise response to SunTrust's request for production of documents; review and revise response to SunTrust's secondset of interrogatories.
8/17/2010	14025	Caughey, Jennifer V.	11.6		-	Compile, review, and analyze materials in preparation for meeting with P. Gavin; confer with B. Baldrate re preparations; correspond with contract attorneys re review.
8/18/2010	14025	Caughey, Jennifer V.	12.1		-	Review and analyze materials in preparation for meeting with P. Gavin; confer with P. Gavin in preparation for her deposition; compile and review materials re meeting with C. Light.
8/19/2010	14025	Caughey, Jennifer V.	13.8	11.7	4,414.21	Review, revise, and finalize Memorandum in Support of Motion for Sanctions, Motion for Sanctions, Index to Exhibits, and Proposed Order; prepare exhibits and papers for filing; review materials in preparation for meeting with P. Gavin; confer with P. Gavin; finalize P. Gavin declaration.
8/20/2010	14025	Caughey, Jennifer V.	12.8	3.5	425.88	Prepare and finalize Motion for Sanctions exhibits and papers for filing; coordinate that filing; draft letter to SunTrust re supplemental production; draft letter to SunTrust re discovery issues; confer with B. Baldrate re deposition preparations; confer with J. Millian re meeting with P. Gavin; prepare materials for J. Millian and W. Durette re preparation for P. Gavin deposition.
8/21/2010	14025	Caughey, Jennifer V.	1.7		-	Review P. Gavin preparation materials; correspond with W. Durette re P. Gavin preparation materials; teleconference with J. Millian and B. Baldrate re P. Gavin preparation for deposition.
8/23/2010	14025	Caughey, Jennifer V.	9.7		-	Review and analyze documents in preparation for B. Lentz deposition; compile and prepare a set of documents to use for B. Lentz deposition preparation; prepare privilege log for recent production; coordinate destruction of clawed back documents; discuss tasks with B. Baldrate; review SunTrust's filing re time to reply to our Motion for Sanctions.
8/23/2010	14025	Caughey, Jennifer V.	0	0.1	44.50	Review SunTrust's filing re time to reply to our Motion for Sanctions.
8/24/2010	14025	Caughey, Jennifer V.	9.7		-	Complete compilation of documents for B. Lentz; review and revise interrogatories to send to SunTrust; review and revise requests for admissions to send to SunTrust; send electronic correspondence to SunTrust confirming that clawed back documents have been destroyed; review, revise and send privilege log to SunTrust.